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**COMMONWEALTH OF KENTUCKY**

**MAR 23 2004**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**PUBLIC SERVICE  
COMMISSION**

**IN THE MATTER OF:**

**AN ADJUSTMENT OF THE GAS AND ELECTRIC )  
RATES, TERMS, AND CONDITIONS OF )  
LOUISVILLE GAS AND ELECTRIC COMPANY )**

**CASE NO.  
2003-00433**

**AND )**

**AN ADJUSTMENT OF THE ELECTRIC )  
RATES, TERMS, AND CONDITIONS OF )  
KENTUCKY UTILITIES COMPANY )**

**CASE NO.  
2003-00434**

**DIRECT TESTIMONY**

**AND EXHIBITS**

**OF**

**STEPHEN J. BARON**

**ON BEHALF OF**

**KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

**J. KENNEDY AND ASSOCIATES, INC.  
ROSWELL, GEORGIA**

**March 2004**

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**DIRECT TESTIMONY OF STEPHEN J. BARON**

**I. QUALIFICATIONS AND SUMMARY**

1  
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3  
4  
5  
6  
7  
8  
9

**Q. Please state your name and business address.**

A. My name is Stephen J. Baron. My business address is J. Kennedy and Associates, Inc. ("Kennedy and Associates"), 570 Colonial Park Drive, Suite 305, Roswell, Georgia 30075.

**Q. What is your occupation and by who are you employed?**

1       A.     I am the President and a Principal of Kennedy and Associates, a firm of utility rate,  
2             planning, and economic consultants in Atlanta, Georgia.

3

4       **Q.     Please describe briefly the nature of the consulting services provided by**  
5             **Kennedy and Associates.**

6

7       A.     Kennedy and Associates provides consulting services in the electric and gas utility  
8             industries. Our clients include state agencies and industrial electricity consumers.  
9             The firm provides expertise in system planning, load forecasting, financial analysis,  
10            cost-of-service, and rate design. Current clients include the Georgia and Louisiana  
11            Public Service Commissions, and industrial consumer groups throughout the United  
12            States.

13

14       **Q.     Please state your educational background.**

15

16       A.     I graduated from the University of Florida in 1972 with a B.A. degree with high  
17             honors in Political Science and significant coursework in Mathematics and  
18             Computer Science. In 1974, I received a Master of Arts Degree in Economics, also  
19             from the University of Florida. My areas of specialization were econometrics,  
20             statistics, and public utility economics. My thesis concerned the development of an

1 econometric model to forecast electricity sales in the State of Florida, for which I  
2 received a grant from the Public Utility Research Center of the University of  
3 Florida. In addition, I have advanced study and coursework in time series analysis  
4 and dynamic model building.

5  
6 **Q. Please describe your professional experience.**

7  
8 A. I have more than twenty-nine years of experience in the electric utility industry in  
9 the areas of cost and rate analysis, forecasting, planning, and economic analysis.

10  
11 Following the completion of my graduate work in economics, I joined the staff of  
12 the Florida Public Service Commission in August of 1974 as a Rate Economist. My  
13 responsibilities included the analysis of rate cases for electric, telephone, and gas  
14 utilities, as well as the preparation of cross-examination material and the preparation  
15 of staff recommendations.

16  
17 In December 1975, I joined the Utility Rate Consulting Division of Ebasco Services,  
18 Inc. as an Associate Consultant. In the seven years I worked for Ebasco, I received  
19 successive promotions, ultimately to the position of Vice President of Energy  
20 Management Services of Ebasco Business Consulting Company. My

1 responsibilities included the management of a staff of consultants engaged in  
2 providing services in the areas of econometric modeling, load and energy  
3 forecasting, production cost modeling, planning, cost-of-service analysis,  
4 cogeneration, and load management.

5  
6 I joined the public accounting firm of Coopers & Lybrand in 1982 as a Manager of  
7 the Atlanta Office of the Utility Regulatory and Advisory Services Group. In this  
8 capacity I was responsible for the operation and management of the Atlanta office.  
9 My duties included the technical and administrative supervision of the staff,  
10 budgeting, recruiting, and marketing as well as project management on client  
11 engagements. At Coopers & Lybrand, I specialized in utility cost analysis,  
12 forecasting, load analysis, economic analysis, and planning.

13  
14 In January 1984, I joined the consulting firm of Kennedy and Associates as a Vice  
15 President and Principal. I became President of the firm in January 1991.

16  
17 During the course of my career, I have provided consulting services to more than  
18 thirty utility, industrial, and Public Service Commission clients, including three  
19 international utility clients.  
20

1 I have presented numerous papers and published an article entitled "How to Rate  
2 Load Management Programs" in the March 1979 edition of "Electrical World." My  
3 article on "Standby Electric Rates" was published in the November 8, 1984 issue of  
4 "Public Utilities Fortnightly." In February of 1984, I completed a detailed analysis  
5 entitled "Load Data Transfer Techniques" on behalf of the Electric Power Research  
6 Institute, which published the study.

7  
8 I have presented testimony as an expert witness in Arizona, Arkansas, Colorado,  
9 Connecticut, Florida, Georgia, Indiana, Kentucky, Louisiana, Maine, Michigan,  
10 Minnesota, Maryland, Missouri, New Jersey, New Mexico, New York, North  
11 Carolina, Ohio, Pennsylvania, Texas, West Virginia, Federal Energy Regulatory  
12 Commission and in United States Bankruptcy Court. A list of my specific  
13 regulatory appearances can be found in Baron Exhibit \_\_\_\_ (SJB-1)

14  
15 **Q. Would you please discuss your experience in electric utility restructuring**  
16 **proceedings?**

17  
18 A. I have been extensively involved in electric utility restructuring since 1995. This  
19 involvement includes participation in eight proceedings in Pennsylvania, seven of  
20 which involved detailed implementation analyses associated with restructuring. In

1           these cases, I addressed stranded costs, regulatory policy associated with retail  
2           competition and restructuring implementation, and rate unbundling. The utilities  
3           included PECO Energy, Pennsylvania Power & Light Company, West Penn Power  
4           Company, Metropolitan Edison Company, Pennsylvania Electric Company and  
5           Duquesne Light Company.

6  
7           I have also been involved in restructuring proceedings in the State of Maryland  
8           associated with Baltimore Gas & Electric Company and Potomac Edison Company.

9           In addition, I participated in a generic proceeding before the Maryland Public  
10          Service Commission on electric utility restructuring and have testified before the  
11          Maryland Legislature on this issue.

12          In 1999, I was involved in restructuring proceedings in West Virginia associated  
13          with the Appalachian Power subsidiary of AEP and Monongahela Power Company,  
14          a subsidiary of Allegheny Power Company. I also participated in restructuring  
15          proceedings in Connecticut involving United Illuminating Company and  
16          Connecticut Light and Power Company. In 2000, I participated in electric  
17          restructuring proceedings in Ohio involving First Energy Corporation and Cinergy.

18  
19          In Louisiana, I have been involved in the Entergy Gulf States, Inc. ("EGSP")  
20          stranded cost proceeding and in the Commission's generic proceeding on retail

1 competition. I have addressed issues on stranded cost quantification, standard offer  
2 tariffs, load profiling and other issues.

3  
4 To date, I have presented testimony in 13 electric restructuring proceedings.

5  
6 **Q. On whose behalf are you testifying in this proceeding?**

7  
8 A. I am testifying on behalf of the Kentucky Industrial Utility Customers (“KIUC”), a  
9 group of large industrial customers taking service on the LG&E and KU systems.

10  
11 **Q. How have you organized your testimony with regard to LG&E and KU issues?**

12 A. For many of the issues that I will discuss, I present common testimony that is  
13 applicable to both LG&E and KU. This would include discussions of basic  
14 principles associated with cost allocation and rate design as well as a number of  
15 other issues, including interruptible and curtailable rates. However, since the  
16 revenue requirement requests and the specific cost of service study results for  
17 LG&E and KU rate classes are different, I will be presenting separate analyses and  
18 discussions of these results.

19

1 For the purposes of organizing my testimony, when I am discussing an issue that is  
2 common to both LG&E and KU, I will refer to these companies as (“the Company”  
3 or the “Companies”). For a specific LG&E and KU issues I will refer to each  
4 Company by name (LG&E or KU).

5  
6 **Q. What is the purpose of your testimony?**

7  
8 **A.** I am presenting testimony on a variety of cost of service and rate design issues  
9 raised by the Company’s filings in this case. The first issue that I address concerns  
10 the Company’s filed cost of service study using the base-intermediate-peak (“BIP”)  
11 class cost of service methodology. I will discuss some specific corrections that I  
12 have made to the Company’s study due to data anomalies that were uncovered in  
13 our analysis (in the case of the KU study), as well as three corrections to the  
14 methodology itself (LG&E and KU). In addition, I will discuss some general  
15 concerns that KIUC has with the BIP method from a methodological standpoint.  
16 However, in order to facilitate the principle recommendation that KIUC is making  
17 with regard to rate class revenue allocation in this case, KIUC will accept the BIP  
18 method as the basis for our revenue apportionment recommendation to rate classes.

19

1 In order to develop an understanding of the subsidies that are currently being paid  
2 and received by various rate classes on the Company's two systems, I also present a  
3 number of alternative cost of service studies based on: 1) the average and excess  
4 method, 2) the summer/winter coincident peak method, 2) the summer coincident  
5 peak method and 4) the 12 CP method. The purpose of these presentations is to  
6 show that under a variety of cost of service studies, the Company's current rate  
7 design and its revenue apportionment proposal does not adequately address the  
8 subsidies currently in the Company's rates. As I will show, under each of these  
9 alternative cost of service studies, the residential class is substantially underpaying  
10 its costs while large commercial and industrial customers are substantially over  
11 paying for electric service. Regulatory commissions are sometimes reluctant to rely  
12 on a single cost of service study to form a strict revenue apportionment policy.  
13 However, in this case, I will show that under a number of cost of service  
14 methodologies that are commonly used in the electric utility industry, residential  
15 customers are substantially underpaying for electric service and large consumers are  
16 substantially overpaying.

17  
18 My testimony specifically addresses the revenue allocation or apportionment  
19 methodology relied upon by the Company in this case to establish the increases for  
20 each rate schedule. Though the Company apparently considers the cost of service

1 results from the BIP method, it has arbitrarily decided that the residential class  
2 should not receive an increase greater than 1% above the system average. This  
3 criterion does not adequately mitigate the significant disparities between rates and  
4 cost of service among the rate classes for either KU or LG&E. I will recommend an  
5 alternative methodology that should be adopted that would specifically reduce the  
6 subsidies by 25% through the allocation of any increase approved by the  
7 Commission. In this manner, the revenue apportionment will move class rates of  
8 return under the BIP method towards cost of service, although at a relatively slow  
9 pace.

10  
11 The next set of issues that I will address concerns the Company's proposed rate  
12 design for large commercial and industrial customers. KIUC generally accepts the  
13 Company's rate design proposals and recommends that the basic structure proposed  
14 by each of the Companies be adopted. The Company has reduced energy charges  
15 and applied increases in this case to the demand charges of these large customer  
16 rates.

17 Following this general policy, KIUC is recommending that any reduction in the  
18 allocated increase to each of these large rate schedules be applied only to the  
19 demand charges, leaving the energy charge as proposed by the Company. I will also  
20 address the proposed new riders being offered by the Company in each of its

1 jurisdictions that would be applicable to large commercial and industrial customers.  
2 For the most part, these new riders do not have a material current impact on  
3 customers in this case, but could do so in the future. My testimony on these issues  
4 does not recommend rejecting the riders, but rather a clarification of the Company's  
5 intention, where applicable, not to apply the riders to existing customer  
6 arrangements.

7  
8 The next issue that I address concerns the Company's proposal to modify its  
9 interruptible rates under the curtailable service rider ("CSR"). The Company is  
10 proposing to substantially modify its interruptible and curtailable rates by increasing  
11 the maximum number of hours of interruption to 500 hours per year and reducing  
12 substantially (in the case of KU) the notice period required for interruption requests.  
13 The Company is proposing to increase the interruptible credit for both LG&E and  
14 KU. I will address each of these issues as well as some additional modifications to  
15 each Company's CSR tariff. In particular, my analysis of the Company's responses  
16 to KIUC data requests indicates that the maximum annual hours of interruption  
17 should be substantially less than the Company's proposed 500-hour annual  
18 maximum. I will also discuss a KIUC proposal to offer a buy-through option that  
19 would permit interruptible customers to purchase power at market rates in the event

1 of a call for interruption, when such interruption is for the purpose of economic  
2 savings to each of the Companies, rather than for reliability.

3  
4 The final issue that I will address concerns the special contract between  
5 MeadWestvaco and Kentucky Utilities Company. KU's cost of service study, and  
6 all of the cost-of-service studies that I developed consistently show that the KU  
7 special contract customer class is being substantially overcharged. Despite this, KU  
8 proposes a rate increase to MeadWestvaco that exceeds both the system average  
9 increase and the increase for Rate Schedule LCI-TOD, the otherwise most nearly  
10 applicable tariff. KU's proposal is based on an incomplete and flawed analysis  
11 which ignores the contractual consideration provided by the customer and which  
12 would effectively negate the value of the Commission approved contract.  
13 Therefore, each special contract in the rate class should receive a below average  
14 increase based on my 25% subsidy reduction proposal. This increase approximates  
15 the increase I have proposed for LCI-TOD.

16  
17 **Q. Would you please summarize your testimony?**

18  
19 **A.** Yes. I recommend and conclude the following:

- 20  
21 • The BIP cost of service method, though lacking in some respects is  
22 adequate to use in the determination of a fair apportionment of any

1 authorized rate increase for LG&E and KU. However, certain corrections  
2 should be made to the studies submitted by LG&E and KU.

- 3
- 4 • Based on the BIP cost of service study, as well as four alternative studies,  
5 substantial subsidies are being paid by other rate classes to the residential  
6 class, for both LG&E and KU. Regardless of the cost study methodology,  
7 these substantial subsidies are present in each Company's rates.  
8
- 9 • LG&E's and KU's proposed revenue apportionment method does not  
10 adequately address the subsidy problem. KIUC is recommending that the  
11 Commission adopt a revenue apportionment method that would explicitly  
12 reduce the amount of current dollar subsidies paid and received by 25% in  
13 this case.  
14
- 15 • KIUC generally supports the Company's proposed large commercial and  
16 industrial rate design. Any changes in the allocated revenue increase to  
17 LG&E's and KU's large commercial and industrial power rates should be  
18 applied to the demand charges proposed by the Companies. Thus for  
19 example, if the Commission reduces the targeted revenue requirement  
20 assignment to KU's rate LCI-TOD by \$1 million, this decrease from the  
21 amount of increase proposed by KU should be used to proportionately  
22 decrease the proposed LCI-TOD demand charges.  
23
- 24 • LG&E's and KU's proposed curtailable service rider ("CSR") should be  
25 modified by : 1) reducing the annual maximum hours of interruption to  
26 175 hours, 2) increasing the required notice period to 1 hour, 3) adjusting  
27 the interruptible credit to reflect fuel savings benefits provided by  
28 interruptible load during actual interruptions and 4) implementing a buy-  
29 through option that would permit CSR customers to continue operating  
30 during economic interruptions if they elect to purchase replacement energy  
31 at market prices.  
32
- 33 • Each of the cost of service studies that I developed, as well as the  
34 Company's study, consistently show that the KU special contract class is  
35 paying well in excess of cost. KU's attempt to unilaterally renegotiate the  
36 MeadWestvaco contract in this case by negating the economic value of the  
37 contract should be rejected. Therefore, each customer in that class should  
38 receive the same percentage increase based upon my 25% subsidy  
39 reduction proposal.



1 These functional allocators for the base, intermediate and peak periods are identical  
2 for both LG&E and KU under the Company's methodology. Once the total  
3 production and transmission demand-related costs have been functionalized to these  
4 three categories, they are allocated to rate classes using three different class  
5 allocation factors. For the 33.58% of production and transmission demand-related  
6 costs that are assigned to the base period, costs are allocated using class energy use.  
7 For the intermediate period costs that comprise 39.97% of all production and  
8 transmission demand-related costs, costs are allocated to classes based on class  
9 contribution to the winter system peak demand. Finally, for peak period costs that  
10 comprise 26.45% of the Company's total production and transmission demand-  
11 related costs under the BIP method, costs are assigned based on each customer  
12 classes' contribution to the summer coincident peak.

13  
14 Under the BIP method, 33.6% of the costs are assigned based on class energy and  
15 40% of the costs are assigned on the basis of contribution to winter peak. Only 26%  
16 of the total production and transmission demand-related costs for either of the two  
17 operating companies are assigned based on customer class contributions to the  
18 summer peak.

1 This is somewhat ironic, since it is the summer peak that drives the Company's  
2 planning requirements to acquire new generating capacity. In fact, based on the  
3 Company's 2001 integrated resource planning document, the summer peak for the  
4 combined Company is expected to exceed the winter peak by about 1000 mWs for  
5 each of the years through 2016. Placing this into perspective, the Company needs  
6 an additional 1000 mWs of generating capacity to meet the summer peak, relative to  
7 the requirements associated with the winter peak. Despite this fact, the Company  
8 has allocated 40% of its costs based on customer class contributions to the winter  
9 peak while allocating only 26% based on class contributions to the summer peak.

10  
11 **Q. Has the Company provided any information that suggests that its proposed**  
12 **BIP methodology is not consistent with the way the Company actually plans its**  
13 **production facilities?**

14  
15 A. Yes. In response to supplemental data request 14 of KIUC, the Company discussed  
16 an alternative cost of service methodology that it considered, but did not use in this  
17 case. This methodology, entitled "Unserved Load Methodology," is described by  
18 the Company as a method that reflects the allocation of costs on the basis of  
19 unserved load hours, based on production simulation model results. According to  
20 the response, the Company's analysis indicated that 71.43% of the unserved load

1 hours occurred during the summer peak period while 28.57% of the unserved load  
2 hours occurred during the winter peak period. Under the unserved load  
3 methodology, 71.43% of the Company's production costs would be assigned based  
4 on summer peak contributions, while 28.57% would be assigned on winter peak  
5 period contributions. This is in contrast to the Company's BIP method that assigns  
6 40% of the costs based on the winter peak and only 26% on the summer peak. In its  
7 response to KIUC No. 14, the Company contrasts the two cost of service methods as  
8 follows:

9  
10 **While the unserved load methodology offers a good**  
11 **representation of how the Company's production facilities are**  
12 **planned, the BIP methodology offers a good representation of**  
13 **how the production system is utilized.**  
14

15  
16 The Company goes on to state in its response that it selected the BIP method  
17 because it had previously been accepted by the Commission.

18  
19 **Q. In its response (referenced above), the Company has identified two alternative**  
20 **characteristics of cost allocation methods. One of these characteristics is an**  
21 **allocation based on planning criteria, the other is based on a utilization**  
22 **criteria. Do you have any comments on these two characteristics associated**  
23 **with cost allocation methods?**

1

2       A.    I generally agree with the Company's characterization of the two methodologies.  
3            The BIP method assigns substantial cost responsibility to customer behavior at the  
4            time of the winter peak, even though from a planning perspective, the Company  
5            appears to agree that the summer peak is driving its costs. From an economic  
6            efficiency standpoint, it would not appear to be particularly rational for rates to be  
7            set based on class behavior at the time of the winter peak, when the Company is  
8            incurring costs because of customer demand at the time of the summer peak. Under  
9            the Company's BIP methodology, even if a customer used no electricity during any  
10           peak hour during the summer period, the customer or customer class would be  
11           assigned almost 74% of the costs that a similar customer would be assigned who  
12           used energy during the summer peak, as well as during the winter and off-peak  
13           periods. This would not seem to be an efficient cost allocation method and one that  
14           would provide consumers with reasonable price signals related to the costs of  
15           providing service.

16

17           The Company has characterized the BIP method as a method that provides a good  
18           representation of "how the production system is utilized." Without agreeing or  
19           disagreeing with this characterization, I would note that allocating costs based on  
20           how the system is utilized is closer to a value of service method for assigning costs

1 as compared to a cost of service method, which should reflect how costs are actually  
2 being incurred to serve customers.

3  
4 **Q. Are there any indications in the Company's rate design that the summer peak**  
5 **is a more significant factor affecting the Company's costs than the winter**  
6 **peak?**

7  
8 A. Yes. LG&E's Rate LP-TOD is a good illustration. Under the Company's proposed  
9 rate design, the peak period demand charge for the summer months is \$9.65 per kW,  
10 while the corresponding peak period demand charge for the winter months is \$7.11  
11 per kW. This rate design reflects a rational response to the incurrence of costs on  
12 the Company's system. Further, it also reflects the fact that market prices during the  
13 summer months in the LG&E/KU region are much higher than in the winter and  
14 other months of the year. The Company is signaling its customers that summer peak  
15 demands for Rate Schedule LP-TOD customers are 36% more costly than winter  
16 peak demands while the Company's cost allocation methodology implies the  
17 reverse. The BIP method weights contributions to the winter peak significantly  
18 more than contributions to the summer peak.

19

1       **Q.    What is your recommendation with regard to the use of the Company's BIP**  
2       **methodology to allocate costs to rate classes in this proceeding?**

3  
4       A.    Though I do not agree with the underlying methodology associated with the BIP  
5       method, KIUC is willing to utilize this methodology in order to establish a proposal  
6       to apportion the Company's authorized revenue increase to rate classes. As I will  
7       discuss subsequently, under a variety of cost allocation methodologies, the results all  
8       indicate that certain rate classes are substantially underpaying relative to the cost to  
9       serve these classes (principally the residential class), while other rate classes are  
10      substantially overpaying rates, relative to the costs to actually provide service to  
11      these customers (large commercial and industrial customers). Under each of these  
12      alternative allocation methods, similar patterns are produced with respect to relative  
13      class rates of return. In each case, the residential class is shown to be receiving  
14      substantial subsidies that are paid by other customers, particularly large customers  
15      on the LG&E and KU systems.

16  
17      **Q.    Before discussing the alternative cost of service studies that you have**  
18      **developed, would you please discuss the corrections that you indicated you**  
19      **have made to the Company's BIP method?**

20

1       A.     For both the LG&E and KU BIP class cost of service studies, I have made three  
2             methodological adjustments to the Company's analysis. These adjustments produce  
3             studies that more properly reflect the underlying assumptions relied upon by the  
4             Company's in these studies. In addition, I have made two data corrections that I  
5             found to be required in the KU BIP study.

6

7       **Q.     Would you please begin your discussion of the common adjustments that you**  
8             **have made to the LG&E and KU BIP cost of service studies?**

9

10       A.     The first adjustment that I made involves the removal of the ECR related rate base  
11             from each of the studies. As discussed by the Company in its testimony and data  
12             responses, the Company removed ECR related costs and revenues from each of the  
13             class cost of service studies, since these costs are being recovered in the ECR rider.  
14             With regard to the investment costs associated with the ECR rider, the Company  
15             adjusted its capitalization by removing the associated amounts that are being  
16             recovered through the ECR. However, the Company did not make any  
17             corresponding adjustments to the rate base of each of the Operating Companies. All  
18             of the ECR related investments continue to be included in the Company's rate base  
19             and only the capitalization, which affects the required rate of return at proposed  
20             rates, has been adjusted. Since these ECR rate base items are not uniform among

1 the customer classes, it is appropriate to also remove these investments from rate  
2 base to produce a consistent cost of service study. These ECR rate base adjustments  
3 are based on the corresponding adjustments that the Company made to its  
4 capitalization.

5  
6 The second adjustment that I made concerns the treatment of the curtailable service  
7 rider (“CSR”) credit in the Company’s cost of service study. The methodology used  
8 by the Company to reflect interruptible and curtailable credits paid to certain of its  
9 customers is to reduce the expenses associated with these credit payments for rate  
10 classes containing customers taking service under the CSR and then allocating this  
11 credit cost as a expense to all rate classes. This methodology, which I generally  
12 support, is consistent with the Company’s underlying economic rational for setting  
13 the interruptible credit. The Company is using the avoided cost associated with a  
14 combustion turbine to set the CSR credit level. Since the CSR credits paid to  
15 customers are essentially payments for combustion turbine capacity, the Company  
16 reasonably treated this cost as an expense that is assignable to all customer classes.  
17 For cost of service purposes, the Company credits this expense to the customer  
18 classes actually providing the interruptible credits and allocates the total to all  
19 customer classes (including the aforementioned classes that provide the credits).

20

1 In this case, the Company is proposing to increase the CSR credit. However, the  
2 Company has not included the increased “expense” associated with this credit in its  
3 present rate cost of service study, although it has reflected this amount in the  
4 proposed rate analysis. A proper cost of service study would reflect a proformed  
5 level of CSR expenses and expense credits at the proposed CSR credit rate in the  
6 cost of service study at “present rates.” This would provide a consistent basis to  
7 analyze the contribution of each customer class to the Company’s overall rate of  
8 return. Under the Company’s method, there is an unequal level of expenses in  
9 present and proposed rates that should be adjusted.

10  
11 The final common adjustment made to both the LG&E and KU BIP cost of service  
12 studies is to change the methodology used to allocate the CSR related expenses to  
13 customer classes. The Company has used the total BIP allocator to assign the CSR  
14 credit expenses to customer classes. A more appropriate allocator for these peaking  
15 costs would be the summer coincident peak allocator since these costs are associated  
16 with combustion turbine capacity that is designed to meet the Company’s peak  
17 demand needs during the summer period that drives the Company’s capacity  
18 requirements.

19

1       **Q.    Would you please discuss the additional corrections that you made to the KU**  
2       **BIP cost of service study?**

3  
4       A.    Based on a review of the KU BIP cost of service study and the accompanying  
5       workpapers, two data anomalies were discovered related to incorrect kW demands  
6       used to develop the allocation factors. The first problem occurs for the all electric  
7       schools and Rate 33 classes, wherein the summer and winter peak demands (used to  
8       allocate peak and intermediate costs) were inadvertently set to “zero” for these  
9       classes. It appears that this was an error in the spreadsheet. The second error  
10      concerns the failure to include any NCP kW demand for Rate Schedule HLFS  
11      secondary load. NCP demand is used to assign costs associated with secondary and  
12      primary distribution service. Though the Company did assign demand for HLFS  
13      primary customers, no HLFS secondary demand was assigned.

14  
15      **Q.    Have you made these corrections to the Company’s filed BIP class cost of**  
16      **service studies?**

17  
18      A.    Yes. Baron Exhibit \_\_\_\_ (SJB-2) contains the corrected KU BIP class cost of  
19      service study, while Baron Exhibit \_\_\_\_ (SJB-7) contains the corrected LG&E BIP  
20      class cost of service study. Both of these studies reflect the aforementioned changes

1 that I have just discussed. Though, in total, these changes do not have a significant  
2 impact on the cost of service study results, I believe they each represent a reasonable  
3 adjustment (and in the case of KU, a required correction) to the Company's studies.  
4

5 **Q. Would you please describe the additional studies that you have developed to**  
6 **assess the contributions of each customer class to the Company's overall cost of**  
7 **service**

8  
9 A. Yes. Baron Exhibits \_\_\_\_ (SJB-3), \_\_\_\_ (SJB-4), \_\_\_\_ (SJB-5) and \_\_\_\_ (SJB-6) contain  
10 the results of three alternative cost of service studies for KU. Each of these studies  
11 incorporates the corrections that I previously discussed with regard to the  
12 Company's BIP cost of service study.

13  
14 The first alternate cost of service study utilizes a traditional average and excess  
15 demand method ("A&E"). The A&E methodology, which allocates production and  
16 transmission demand costs in this study is presented in Exhibit \_\_\_\_ (SJB-3). This  
17 traditional cost of service method allocates demand related costs based on each  
18 class's contribution to average demands and the class contribution to excess  
19 demands, which is defined as the class peak mW in excess of the average demand  
20 mW for the class. The calculation of each class's allocation factor is two-fold.

1 First, production and transmission demand costs are assigned into two functional  
2 categories in a manner similar to the BIP method. The functional allocator used in  
3 the A&E method is the system load factor (about 60% for KU, 51% for LG&E).  
4 The costs that are allocated using class contribution to average demand is the  
5 amount equal to the system load factor (in percent) times the total production and  
6 transmission demand costs. The remaining amount of production and transmission  
7 demand related costs  $[(1 - \text{load factor}) \times \text{total demand costs}]$  is allocated on  
8 each classes' relative excess demand. Excess demand is defined as the class non-  
9 coincident peak minus the class average demand.

10  
11 **Q. What is the rationale for the A&E methodology?**

12  
13 A. The A&E method recognizes that production and transmission demand costs are  
14 incurred for both an energy and a demand basis. However, unlike the BIP method,  
15 the energy share of costs is equal to the system load factor. For the remaining  
16 amount of costs, however, the allocation is based on each customer classes' excess  
17 demand. Though this excess demand is based on the class non-coincident peak,  
18 rather than the coincident peak, it is a measure of the relative load factor of the class  
19 compared to the system load factor. For a 100% load factor customer, for example,  
20 the excess demand would be zero and there would be no allocation of the excess

1 component of costs. One of the reasons why the class non-coincident demand is  
2 used for the excess portion is that if the class coincident peak demand is used, the  
3 A&E method becomes identical to a single coincident peak method.

4  
5 **Q. Would you please discuss the remaining cost of service studies that you have**  
6 **developed for KU?**

7  
8 A. Baron Exhibit \_\_\_\_ (SJB-4) contains the results of a summer/winter average  
9 coincident peak cost of service study, while Exhibit \_\_\_\_ (SJB-5) contains the results  
10 of a single summer coincident peak study. Exhibit \_\_\_\_ (SJB-6) contains the results  
11 of a 12 CP study. Each of these studies represents additional cost of service  
12 methodologies that have been used to allocate production and transmission demand  
13 costs. In fact, the summer winter average method is similar to the unserved load  
14 methodology that I referenced earlier in my testimony except that it is based on an  
15 equal weighting between the summer and winter peaks instead of the 73/27%  
16 weighting that the Company computed using the unserved load method.

17  
18 **Q. What do the studies show with regard to the rate of return paid by the**  
19 **residential class and the all-electric residential class?**

20

1       A.     As can be seen from each of the exhibits summarizing the studies evaluated, the  
2             residential and all electric residential classes pay substantially below the average  
3             system rate of return. Under each of these methods, the residential class barely  
4             covers its cost of service expenses and provides only a small portion of its share of  
5             KU's return. In fact, in a number of cases, the all-electric residential class produces  
6             a negative rate of return, while the residential class produces a negative rate of  
7             return under the summer CP method. Even under the Company's BIP method,  
8             which generally favors low load factor classes such as the residential class because  
9             of its use of an energy allocator for a substantial part of the costs, the Company's  
10            residential class is only paying a rate of return on investment of 0.84%, compared to  
11            the system average rate of return of 4.27%. This is in contrast to the rate of return  
12            paid by large commercial and industrial customers on Rate LCI-TOD. These  
13            customers are paying rates of return of between 8% and 10%, compared to the  
14            system average rate of return of 4.27%. The Company's coal mining rates are  
15            paying rates of return even higher than this level. Similar results are shown for the  
16            special contracts class that contains large industrial customer load.

17  
18       **Q.     Is there an alternative way to present this cost of service information so that it**  
19             **could be used to assess the relative contribution of each customer class to the**  
20             **Company's overall costs?**

1

2       A.     Yes. Table 1 below shows a summary for the five cost of service studies of the  
3       relative class rates of return under present rates.

1

		<u>Corrected BIP</u>	<u>Average &amp; Excess</u>	<u>Sum/Win CP</u>	<u>Summer CP</u>	<u>12 CP</u>
Total System		1.000	1.000	1.000	1.000	1.000
Residential	Rate RS	0.196	0.119	0.175	(0.025)	0.220
All Electric Residential	FERS	0.113	(0.083)	(0.058)	0.624	0.231
General Service	GS	1.454	0.960	1.361	0.983	1.099
Combined Light & Power	LP,HLF, M	2.120	2.568	2.323	1.878	1.985
Large Comm/Ind TOD	LCI-TOD	1.902	2.444	2.393	2.121	1.768
Coal Mining Power Primary	MPP	3.179	2.874	3.511	3.860	2.726
Coal Mining Power Transmission	MPT	2.848	3.153	3.196	3.612	2.596
Large Power Mine TOD Pri	LMPP	2.370	1.673	2.830	3.216	1.654
Large Power Mine TOD Trans	LMPT	2.405	2.292	2.605	2.999	2.509
Combination Off-Peak	CWH	(3.264)	(3.254)	(3.234)	(3.215)	(3.211)
All Electric School	AES	1.084	0.490	1.010	0.515	0.718
Electric Space Heating Rider	33	0.452	(0.021)	0.410	0.018	0.050
Street Lighting	St Lt	(0.128)	(0.190)	(0.122)	(0.004)	(0.052)
Decorative Street Lighting	Dec St Lt	0.769	0.733	0.778	0.854	0.823
Private Outdoor Lighting	PO Lt	2.143	1.932	2.260	3.078	2.726
Customer Outdoor Lighting	C O Lt	1.643	1.449	1.736	2.447	2.142
Special Contracts		2.060	2.810	1.941	1.347	3.719

2

3

This type of analysis is commonly referred to as a rate of return index presentation.

4

For the total system, the rate of return index is 1.0. For the residential class, under

5

the corrected BIP method, the rate of return index is 0.196. This means that

1 residential customers are paying a rate of return at approximately 20% of the system  
2 average. This is in contrast to the rate of return index for the large  
3 commercial/industrial time-of-day class that has a rate of return index of 1.9. For  
4 this class, customers are paying a return on investment equal to 190% of the system  
5 average. A similar result occurs for the special contact class.

6  
7 **Q. What conclusions do you draw from these relative rate of return indices using**  
8 **a variety of cost of service methods?**

9  
10 A. Regardless of the cost of service method, residential and residential all electric  
11 customers are paying rates of return substantially below the system average rate of  
12 return. Under each method, residential customers are barely contributing any  
13 amount to the Company's overall return on investment. At the same time, large  
14 industrial customers under Rate Schedule LCI-TOD and special contracts are paying  
15 rates of return two or more times the system average rate of return at present rates.  
16 The fact that this result occurs under a variety of cost of service methodologies  
17 suggests that it is not simply the selection of a cost of service method that is  
18 producing these results, but rather it is a clear indicator that substantial subsidies  
19 exist in KU rate.

20

1       **Q.    Have you prepared similar analyses for LG&E?**

2

3       A.    Yes.   Baron Exhibits \_\_\_\_ (SJB-7), \_\_\_\_ (SJB-8), \_\_\_\_ (SJB-9), (SJB-10) and  
4       \_\_\_\_ (SJB-11) contain cost of service study results for LG&E reflecting the same  
5       five study methodologies. The corrected BIP method that I previously discussed  
6       presented in Exhibit (SJB-7), while Exhibits (SJB-8) through (SJB-11) contain the  
7       LG&E A&E results, the summer/winter CP results, the summer CP results.

8

9       **Q.    Do the LG&E cost of service study results, under each of the five methods, lead**  
10       **to similar conclusions with regard to subsidies being paid to residential**  
11       **customers?**

12

13       A.    Yes. As can be seen, the rate of return for residential customers is in the range of  
14       1.7% based on the corrected BIP method, compared to an overall system rate of  
15       return of 4.59%. For large customers on Rates LP and LP-TOD, the rate of return  
16       under the corrected BIP method is 5.82%, while under the four alternative methods  
17       the rate of return rises to between 7% and 9%.<sup>1</sup> Table 2 summarizes these class  
18       rates of return using the relative rate of return indices.

---

<sup>1</sup> These reflect a combined rate of return for LP/LP-TOD rates.

1

**Table 2**  
**Louisville Gas & Electric Company**  
**Class Rate of Return Indices under Present Rates**

		<u>Corrected</u>	<u>Average</u>	<u>Sum/Win</u>	<u>Summer</u>	<u>12</u>
		<u>BIP</u>	<u>&amp; Excess</u>	<u>CP</u>	<u>CP</u>	<u>CP</u>
Total System		1.000	1.000	1.000	1.000	1.000
Residential	Rate R	0.368	0.367	0.255	0.312	0.509
Water Heating	Rate WH	(1.606)	(1.825)	(1.599)	(1.531)	(1.599)
General Service	Rate GS	2.095	1.558	1.875	1.341	1.630
Rate LC/LC-TOD		1.649	1.778	1.699	1.583	1.350
Rate LP/LP-TOD		1.269	1.529	1.761	2.051	1.274
Street Lighting	Rate PSL	0.705	0.634	0.916	1.508	1.246
Street Lighting	Rate SLE	0.103	(0.301)	0.802	9.501	3.024
Street Lighting	Rate OL	0.790	0.721	0.967	1.434	1.232
Street Lighting	Rate TLE	2.424	3.796	3.422	4.400	2.664
Special Contracts		1.344	1.451	1.758	1.708	1.452

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As can be seen, the residential class is producing a relative rate of return of .368 which means that residential customers are paying a rate of return of about 37% of the system average rate of return. This is in contrast to large power customers who are paying a rate of return of approximately 130% of the system average under the BIP method and relative rates of return of 150% to 200% under the alternative methods. For special contracts, similar results are also shown. Again, for LG&E as in the case of KU, under a variety of cost of service methods, residential customers are receiving substantial subsidies from other customer classes.

1

2       **Q.    Has KU proposed increases for each of its customer classes to address the**  
3       **subsidy problem that you have just identified?**

4

5       A.    No. Table 3 shows the proposed increases requested by KU in this case. Based on  
6       the Company's overall increase request of \$58.9 million, total revenues will increase  
7       by 8.7% or 14.2% on a non-fuel basis. For residential customers, the Company is  
8       proposing to increase rate revenues by 9% (.3% higher than the system average) or  
9       13.7% on a non-fuel basis. Since the increase requested by the Company in this  
10      case is related to non-fuel costs, it is appropriate to look at the impact of the  
11      Company's increase on non-fuel rate revenues. On this basis, despite the fact that  
12      the residential class is not paying even close to cost of service at present rates, the  
13      Company is actually proposing a smaller increase to non-fuel rate revenues for  
14      residential customers than the system average increase. The final column of the  
15      table shows the rate of return index at proposed rates under the Company's revenue  
16      apportionment recommendation. As can be seen, the Company is proposing to  
17      move the residential class to a rate of return index of 0.493. This means that under  
18      the Company's proposed rates, residential customers will continue to pay a rate of  
19      return on allocated investment at about 44% of the system average rate of return.

1

	<b>KU Proposed Increase</b>	<u>Percent Increase</u>		<b>ROR Index at Proposed Rates (1)</b>
		<u>on Total Rate Revenues</u>	<u>on Non-Fuel Rate Revenues</u>	
Total System	58,911,660	8.7%	14.2%	1.000
Residential	10,917,610	9.0%	13.7%	0.439
All Electric Residential	13,171,979	10.0%	15.7%	0.391
General Service	5,663,282	8.6%	11.9%	1.262
Combined Light & Power	18,928,419	8.3%	14.4%	1.813
Large Comm/Ind TOD	6,910,666	8.2%	16.6%	1.702
Coal Mining Power Primary	405,257	8.5%	14.6%	2.529
Coal Mining Power Trans	319,850	8.5%	16.4%	2.333
Large Power Mine TOD Pri	165,746	8.5%	15.6%	2.012
Large Power Mine TOD Trans	347,607	8.5%	17.6%	1.995
Combination Off-Peak	96,148	23.2%	45.8%	(1.873)
All Electric School Electric Space Heating Rider	129,034	19.3%	31.9%	1.046
Street Lighting Decorative Street Lighting	76,631	9.5%	9.9%	0.666
Private Outdoor Lighting Customer Outdoor Lighting	72,319	8.1%	9.8%	1.289
Special Contracts	676,728	4.7%	9.7%	1.525

(1) ROR index using Corrected BIP Cost of Service Study

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Focusing on the large commercial/industrial time of day rate, the Company is proposing an increase in total rate revenues of 8.2% and 16.6% on non-fuel rate revenues, well above the system average increase of 14.2% on non-fuel rate revenues. As can be seen, the proposed rate of return index for these large

1 customers is 1.7 (170% of system average). For special contract customers, the  
2 Company is proposing a lower overall revenue increase for the class, on both a total  
3 rate revenue and a non-fuel rate revenue basis. However, the rate of return index at  
4 proposed rates still continues to be 1.5 (150% of the system average). More  
5 importantly, as I will discuss, for one of the special contract customers,  
6 MeadWestvaco, the proposed non-fuel increase is 50% above the system average  
7 (22% compared to the system average increase of 14.2%).  
8

9 **Q. Is the Company proposing a similar revenue apportionment approach for**  
10 **LG&E?**  
11

12 A. Yes. Table 4 shows a similar analysis for the LG&E proposed increases. The  
13 Company is proposing an overall increase of 11.4% on total rate revenues and 15%  
14 on non-fuel revenues. For residential customers, with a test year relative rate at  
15 return of about half that of system average at present rates, customers will receive an  
16 increase of 12.3% on total revenues and 15.6% on non-fuel rate revenues, almost  
17 about the same as the system average. At proposed rates, the rate of return index for  
18 residential customers under the BIP method advocated by the Company is about  
19 0.56. This means that these residential customers will contribute a rate of return on  
20 investment at about 56% of the level of the system average. Again, this can be

1

		LG&E Proposed Increase	Percent Increase		ROR Index at Proposed Rates (1)
			on Total Rate Revenues	on Non-Fuel Rate Revenues	
Total System		64,260,364	11.4%	15.0%	1.000
Residential	Rate R	26,277,410	12.3%	15.6%	0.557
Water Heating	Rate WH	156,774	21.7%	30.1%	(0.770)
General Service	Rate GS	8,974,815	11.0%	13.7%	1.776
	Rate LC/LC-TOD	13,708,637	10.6%	14.3%	1.449
	Rate LP/LP-TOD	10,638,506	10.8%	15.9%	1.199
Street Lighting	Rate PSL	586,307	12.3%	14.0%	0.690
Street Lighting	Rate SLE	17,030	12.3%	18.4%	0.376
Street Lighting	Rate OL	726,051	12.3%	13.7%	0.739
Street Lighting	Rate TLE	56,796	10.4%	13.8%	2.015
Special Contracts		3,118,038	11.4%	14.9%	1.283

(1) ROR index using Corrected BIP Cost of Service Study

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contrasted to the Company's proposal for Rate LP time-of-day customers who are receiving an increase on total rate revenues of 10.8% and non-fuel rate revenues of 15.9% (in excess of the system average). Again, the Company is proposing a rate of return index for these customers at proposed rates of about 1.2, which means that these customers will continue to pay a rate of return at a level of 120% of the Company's required rate of return. Similar results are shown for special contract customers.

1       **Q.    What overall conclusions have you drawn from your analysis of the**  
2       **Company's proposed increases in this case for both KU and LG&E?**

3  
4       A.    Both LG&E and KU have failed to adequately address the subsidy problem in their  
5       recommended apportionment of the overall revenue increases in this case.  Even  
6       under the BIP cost of service study methodology advocated by the Company as the  
7       basis to measure the relationship between rates and cost of service, there is no  
8       material mitigation in the subsidy problem under the Companies' proposals.

9  
10      **Q.    Have you developed an alternative methodology to apportion the Company's**  
11      **authorized revenue requirement increase in this case?**

12  
13      A.    Yes.  I am recommending a methodology that would specifically provide for  
14      mitigation of the subsidies under present rates paid and received by each rate class.  
15      The methodology that I recommend is a "25% subsidy reduction method," wherein  
16      the subsidies paid and received by each rate class at present rates are reduced by  
17      25% in the apportionment of the authorized revenue requirement increase, if any.

18  
19      Though the alternative cost of service methods that I have looked at (A&E, S/W  
20      average, and summer CP and 12 CP) generally produced more favorable results to  
21      large industrial and commercial customers, I am relying on the Company's BIP

1 methodology as corrected, to apportion the revenue increase. Under a 25% subsidy  
2 reduction methodology, the proposed increases for each customer class are  
3 specifically designed to mitigate 25% of the subsidy at proposed rates. Baron  
4 Exhibits \_\_\_(SJB-12) and \_\_\_(SJB-13) present the results of the 25% subsidy  
5 reduction methodology for KU and LG&E respectively.  
6

7 **Q. Would you please explain the revenue requirement methodology that you are**  
8 **recommending in Exhibits (SJB-12) and (SJB-13)?**  
9

10 A. The methodologies are identical for both Companies and for the purposes of  
11 explaining the approach, I will refer to the KU analysis presented in Exhibit (SJB-  
12 12). Pages 1 through 3 of Exhibit (SJB-12) contain the results for each KU rate  
13 class or rate group (a group of rate schedules with related rate design objectives).<sup>2</sup>  
14 To simplify the explanation of Exhibit (SJB-12), I will focus on the large  
15 commercial/industrial TOD rate schedule. The first set of rows in the exhibit shows  
16 the rate of return at present rates under the Company's BIP cost of service study,  
17 corrected for the problems that I previously addressed. As shown, for the LCI-TOD  
18 rate, the rate of return at present rates is 8.12%, compared to the system average rate  
19 of return of 4.27%.

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<sup>2</sup> Following the approach of the Company, certain rate classes have been grouped together for the purposes of assigning a revenue increase target for the class or rate schedule. As discussed by the Company in data responses, certain rate schedules have been grouped together by the Company to insure that there is no incentive or disincentive for customers switching due to a change in the relative rates among these schedules.

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The second set of rows develops the rate of return at KU's proposed rate increase for each customer class or rate grouping. For the LCI-TOD rate, the Company's is proposing an increase of \$6.9 million that would produce a rate of return at proposed rates to 11.51%. This compares to an overall KU rate of return for all rate classes at proposed rates of 6.76%. As I show in Table 3, the rate of return index at proposed rates recommended by KU in this case for the large commercial and industrial TOD rate is 1.7 (the ratio of 11.51% to 6.76%). Despite the Company's proposal to assign a slightly lower overall revenue increase for this class (8.2%) than the system average increase (8.7%), the Company's proposal does very little to reduce the subsidies paid by LCI-TOD customers. Again, it is important to remember that this subsidy analysis is premised on the Company's recommended cost allocation methodology in this case, the BIP method.

The next portion of Exhibit (SJB-12) is designed to calculate the increase that would be appropriate if current subsidies (at present rates) are reduced by 25%, after the proposed rate increase. As can be seen for the LCI-TOD class, the subsidy that KU is recommending at proposed rates for these customers is \$9.67 million. This compares to the current subsidy of \$7.8 million. KU is proposing to actually increase the subsidy paid by LCI-TOD customers by 23%. Ironically, the Company

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KIUC recommends adopting this general approach.

1 is also proposing to increase the subsidies received by residential customers by  
2 almost \$2 million and the subsidies received by “all electric residential” customers  
3 by an additional \$2 million. Despite the Company’s proposal in this case to increase  
4 residential rates by approximately 1% above the system average as recognition of  
5 the large subsidies being received by these rate schedules, the Company’s increase  
6 recommendation actually moves subsidies in the opposite direction. Subsidies are  
7 increased for residential customers on Rate RS and Rate FERS.

8  
9 Continuing with the discussion of the 25% subsidy reduction methodology, the base  
10 rate increase required for a 25% subsidy reduction is computed and shown to be  
11 \$3.122 million for Rate LCI-TOD. This produces a rate of return at proposed rates  
12 for this rate class of 9.65%, reflecting a 25% subsidy reduction. As can be seen in  
13 the fourth set of rows (bottom portion of the exhibit), the amount of subsidies after  
14 the increase under KIUC methodology for LCI-TOD would be \$5.8 million, which  
15 is a 25% reduction from the current subsidy of \$7.8 million.

16  
17 The final three rows of the exhibit summarize the results of the analysis. The  
18 Company is proposing an overall increase of 8.7% on total rate revenues. For Rate  
19 Schedule LCI-TOD, KU is proposing an 8.21% increase. This contrasts with a  
20 3.27% reduction that would be required if the Company were to achieve equalized

1 rates of return at proposed rates. Since the KIUC recommended apportionment  
2 method only reduces subsidies by 25% (as opposed to 100% that would be required  
3 for equalized rates of return), KIUC is proposing an increase for LCI-TOD of  
4 3.71%, assuming that the Company received its entire revenue requirement request  
5 in this case. For residential customers, the Company is proposing a 9.01% increase,  
6 while a 25% subsidy reduction methodology produces a 14.4% increase for Rate RS  
7 customers. However, it is important to recognize that these percent increases are  
8 premised on the Company receiving its entire \$59 million revenue increase request  
9 in this case. To the extent that the Company receives an amount less than its  
10 request, as recommended by other KIUC witnesses in this case, the 25% subsidy  
11 reduction revenue apportionment methodology would produce lower increases for  
12 each customer class.

13  
14 Table 5 shows the allocation of the increase using the KIUC proposed methodology,  
15 based on the Company's \$58.9 million revenue increase request. The column  
16 labeled "Allocation of Increase" shows the apportionment of the \$58.91 million  
17 increase to each rate class using the 25% subsidy methodology. KIUC recommends  
18 using this allocation apportionment (the percentages shown on Table 5) for any  
19 increase granted KU in this case. Finally, in the event that KU receives a revenue  
20 decrease in this proceeding, KIUC would recommend following the 25% subsidy

- 1 reduction method, with the caveat that no rate class or group of rate classes should
- 2 receive an increase.

1

**Table 5**  
**Kentucky Utilities**  
**KIUC Proposed Increase using "25% Subsidy Reduction" (1)**  
**(Assuming 100% of KU Requested Increase)**

		<b>Proposed Increase</b>		<b>Allocation Of Increase</b>
		<b>\$ Amount</b>	<b>% Total Rev</b>	
Total System		58,911,660	8.7%	100.000%
Residential	Rate RS	17,484,557	14.4%	29.679%
All Electric Residential	Rate FERS	21,185,839	16.1%	35.962%
General Service	GS	4,905,523	7.5%	8.327%
Combined Lit & Pow	LP,HLF,M	7,857,308	3.5%	13.337%
Large Comm/Ind TOD	LCI-TOD	3,122,526	3.7%	5.300%
Coal Mining Pow Pri	MPP	23,193	0.5%	0.039%
Coal Mining Pow Trans	MPT	48,456	1.3%	0.082%
Lg Pow Mine TOD Pri	LMPP	49,345	2.5%	0.084%
Lg Pow Mine TOD Trns	LMPT	108,077	2.6%	0.183%
Combination Off-Peak	CWH	536,171	129.4%	0.910%
All Elcetric School	AES	328,759	8.3%	0.558%
Electric Space Heat	33	77,318	11.6%	0.131%
Street Lighting	St Lt	1,988,224	36.8%	3.375%
Decorative St Lighting	Dec St Lt	171,660	21.3%	0.291%
Private Outdoor Lighting	PO Lt	340,841	5.4%	0.579%
Customer Outdoor Lgt	C O Lt	76,820	8.6%	0.130%
Special Contracts		607,042	4.2%	1.030%

(1) Based on Corrected BIP Cost of Service Study

2

3

1       **Q.    Is the methodology that you are recommending for LG&E, as shown in Exhibit**  
2       **(SJB-13), identical to the method you have just discussed for KU?**

3  
4       **A.    Yes. Baron Exhibit (SJB-13), pages 1 and 2, presents an identical analysis for**  
5       **LG&E using the corrected BIP cost of service study results that I previously**  
6       **discussed. Table 6 shows the KIUC recommended apportionment of LG&E's**  
7       **\$64.26 million revenue increase.**

8

<b>Table 6</b>				
<b>Louisville Gas &amp; Electric Company</b>				
<b>KIUC Proposed Increase using "25% Subsidy Reduction" (1)</b>				
<b>(Assuming 100% of LGE Requested Increase)</b>				
		<b>Proposed Increase</b>		<b>Allocation of Increase</b>
		<b>\$ Amount</b>	<b>% Total Rev</b>	
Total System		64,260,364	11.4%	100.000%
Residential	Rate R	37,864,144	17.7%	58.923%
Water Heating	Rate WH	477,652	66.1%	0.743%
General Service	Rate GS	3,767,827	4.6%	5.863%
Rate LC/LC-TOD		8,926,641	6.9%	13.891%
Rate LP/LP-TOD		8,710,760	8.9%	13.555%
Street Lighting	Rate PSL	999,777	20.9%	1.556%
Street Lighting	Rate SLE	27,656	19.9%	0.043%
Street Lighting	Rate OL	1,222,512	20.7%	1.902%
Street Lighting	Rate TLE	16,316	3.0%	0.025%
Special Contracts		2,247,079	8.2%	3.497%

(1) Based on Corrected BIP Cost Study

9

1 Assuming the Company receives a lower authorized revenue increase, as  
2 recommended by KIUC, the allocation percentages shown in Table 6 should be used  
3 to apportion the increase. Finally, as in the case of KU, if the Company were to  
4 receive a revenue decrease in this proceeding, the decrease should be allocated to  
5 reduce subsidies by 25%, subject to the caveat that no customer class or group of  
6 classes should receive an increase.

7  
8 **Q. KIUC is proposing that the Commission adopt a specific methodology in this**  
9 **case to address the subsidy problem that you have identified in both the KU**  
10 **and LGE rates. Do you believe that your proposal to reduce subsidies by**  
11 **25% is consistent with the economic development objectives of the State of**  
12 **Kentucky?**

13  
14 **A.** Yes. The Kentucky Cabinet for Economic Development (“KCED”) has issued a  
15 White Paper that specifically addresses the significance of low cost electricity in  
16 Kentucky as a factor in attracting and keeping industry in the State. According to  
17 the White Paper:

18  
19 **“In Kentucky, we provide a wealth of information about power for**  
20 **companies considering us in the site selection process. And we are**  
21 **often asked about it since we have been ranked the least expensive for**  
22 **industrial users of electricity, Strong said”** [*Shedding Light on Energy:*  
23 *How Supply and Costs Affect Business Decisions*, KCED White Paper,  
24 [http://www.thinkkentucky.com/kyedc/pdfs/Whitepaper\\_energy.pdf](http://www.thinkkentucky.com/kyedc/pdfs/Whitepaper_energy.pdf).]  
25

1           In this case, KIUC is only requesting that the Commission recognize that the  
2           reduction of subsidies is a reasonable policy objective and that it should be  
3           implemented gradually (25% reduction) beginning in this case for both KU and  
4           LGE.

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**III. RATE DESIGN ISSUES**

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**Q. Have you reviewed the Company's proposed rate design for large commercial and industrial customers on the KU and LG&E systems?**

A. Yes. In both cases (LG&E and KU), the proposed rate design results in a reduction in the energy charges of the large customer rates and increases in the demand charges. As a general rate design policy matter, KIUC supports the Company's basic rate design for Rate Schedules LP and LP-TOD in the case of LG&E and LCI-TOD on the KU system. For both Companies, the rate design philosophy recognizes that the Company's cost of service results support lower energy charges and higher demand charges, every thing else being equal.

**Q. Under the assumption that the Commission authorizes a lower revenue increase than requested by each of the Companies and/or adopts the KIUC recommendation to reduce subsidies by 25%, the revenue requirement target for each of the large commercial and industrial rates would be reduced, compared to the targets used by the Company. What is your recommendation as to how KU's proposed LCI-TOD and LG&E's proposed LP-TOD and LP rates should be adjusted in the event of a lower revenue requirement target?**

1

2       A.     Since KIUC generally supports the Company's proposal to decrease the energy  
3             charges of each of the rates and apply any authorized revenue increases to the  
4             demand charges, KIUC would recommend continuing this policy in the event that  
5             the revenue increases required from each of these rate schedules is lower than  
6             proposed by the Company. In order to accomplish this objective, KIUC  
7             recommends that any adjustment to the target revenue increase required pursuant to  
8             the Commission's decision in this proceeding be applied on an equal percentage  
9             basis to reduce the demand charges proposed by the Company in its filing. For the  
10            energy charges of the respective rates, KIUC recommends the Company's proposed  
11            levels.

12

13       **Q.     Do you have any examples of how this rate design methodology would be**  
14             **implemented?**

15

16       A.     Yes. Baron Exhibit \_\_\_\_ (SJB-14), pages 1 and 2 show the proposed rate design for  
17             KU Rate Schedule LCI-TOD, primary and transmission. The methodology  
18             recommended by KIUC is to apply the decrease in targeted revenue requirements  
19             for the LCI-TOD rate class to the demand charges of both rates, on an equal

1 percentage basis. In addition, KIUC would maintain, on a constant dollar basis, the  
2 proposed voltage differential between the primary and transmission rates.

3  
4 Under the Company's LCI-TOD rate design proposal, this class receives an increase  
5 of \$6,910,666 (see Table 3). Under the KIUC methodology of reducing subsidies  
6 by 25%, LCI-TOD would receive an increase of \$3,122,526 (assuming KU is  
7 authorized all of its requested increase). The KIUC rate design recommendation is  
8 to apply the reduced revenue increase target (\$3,788,140) to the Company's  
9 proposed LCI-TOD demand charges. Since KIUC wants to maintain the absolute  
10 voltage differentials between primary and transmission, as proposed by the  
11 Company, the \$3.788 million reduction in the revenue increase target is applied to  
12 the demand charges recommended by KU in this case on an across-the-board basis,  
13 holding constant the voltage differentials recommended by KU. Page 1 of Exhibit  
14 (SJB-14) shows the results of this analysis. As can be seen in columns 7 and 8,  
15 KIUC is recommending that the customer charge and the energy charge be  
16 maintained at the proposed KU levels. All of the revenue adjustment that KIUC is  
17 recommending for Rate LCI-TOD is applied to the on- and off-peak demand  
18 charges.

1 Under the Company's proposal, the on-peak demand charge is \$5.52, while the  
2 charge under the KIUC adjusted rate is \$4.79. The end result is to produce an  
3 increase for the primary portion of LCI-TOD of \$2.4 million as compared to the  
4 Company's proposed increase of \$5.38 million.

5  
6 Page 2 of the exhibit shows a similar analysis for Rate LCIT-TOD, which is the  
7 transmission voltage portion of Rate Schedule LCI-TOD. This rate design follows  
8 the same methodology as shown on page 1 of the exhibit. The end result is that the  
9 proposed on-peak and off-peak demand charges for the primary rate code differ  
10 from the corresponding charges for the transmission rate code by exactly the same  
11 differential as proposed by the Company for Rate LCI-TOD.

12  
13 **Q. Have you performed a similar analysis as an illustration for LG&E's Rate**  
14 **Schedule LP-TOD?**

15  
16 A. Yes. In the case of the LP-TOD rate schedule, the Company has indicated in data  
17 responses that its rate design philosophy is to group the LP-TOD and LP schedules  
18 together, to maintain the relationship between the two rates. Following KIUC's  
19 adoption of the Company's general rate design philosophy, I have prepared an  
20 analysis of the recommended changes to Rates LP and LP-TOD that reflects the

1 reduced revenue requirement target recommended by KIUC, but maintains the  
2 Company's basic rate design philosophy. Baron Exhibit \_\_\_\_ (SJB-15) shows the  
3 results of this adjusted rate design for Rate Schedules LP and LP-TOD. All of the  
4 target revenue requirement change (in the form of a reduction from that proposed by  
5 LG&E) has been applied to the demand charges of the rate, while maintaining  
6 differentials on a voltage basis and among Rate Schedules LP and LP-TOD.

7  
8 **Q. Each of the Companies is proposing new tariffs or changes in tariffs associated**  
9 **with riders that would be applicable to large commercial and industrial**  
10 **customers. Have you reviewed these proposals for new riders?**

11  
12 A. Yes. Both LG&E and KU are proposing three riders that would be applicable to  
13 KIUC members, under certain circumstances. The first of these riders is the excess  
14 facilities rider that provides a mechanism for customers to pay for contributions in  
15 aid of construction monthly, rather than in a single payment. For LG&E, the  
16 Company is proposing to implement an excess facilities rider for new construction  
17 projects but would continue to apply the existing facilities rider to existing customer  
18 facilities. As such, for LG&E, there is no cost impact from the proposed excess  
19 facilities rider on existing customers. KIUC does not object to the Company's

1 proposal for the LG&E rider, as long as the provision regarding applicability is  
2 maintained in the tariff.

3  
4 For KU, there is no current excess facilities charge rider. Rather, current customers  
5 pay a lease rate associated with contributions in aid of construction. Under the  
6 excess facilities rider for KU, which is a new rider, the lease rate would be reduced.  
7 KIUC does not object to KU's excess facilities rider.

8  
9 **Q. Would you please discuss the Company's proposed redundant capacity tariff?**

10  
11 **A.** For both KU and LG&E, the redundant capacity rider is new and, according to the  
12 Company, does not have any test year revenues associated with the rider. Based on  
13 discovery responses from the Company, no existing customer facilities would be  
14 charged under this redundant capacity rider.

15  
16 It appears that the redundant capacity rider is designed to reflect additional costs that  
17 the Company incurs on its distribution system associated with redundant distribution  
18 feeders that would be paid for through the excess facilities rider. For specifically  
19 assigned distribution facilities (e.g., a separate distribution feeder), customers are  
20 required to pay for this investment through a contribution in aid of construction,

1           pursuant to the excess facilities rider. The redundant capacity rider is designed to  
2           recover incremental costs associated with the distribution system that may be  
3           incurred as a result of providing an alternative distribution feeder to a customer  
4           location.

5  
6           Though in principle, KIUC does not object to the redundant capacity rider, KIUC  
7           recommends a change to the redundant capacity rider, in the event that the  
8           Commission approves the tariff. The change that KIUC recommends is: for each  
9           instance wherein the Company proposes to charge a redundant capacity fee, the  
10          Company must provide to the customer an analysis that shows that the Company  
11          will in fact require additional distribution facilities (above the customer provided  
12          contributions) in order to provide the redundant distribution capacity to the  
13          customer. Under the Company's proposal, the Company would simply be able to  
14          charge the customer an additional charge (in the form of a reservation charge) for  
15          the assumed additional distribution network facilities that are required to provide the  
16          customer with a redundant service, beyond the customer specific costs paid for  
17          through the excess facilities rider. KIUC recommends that the Company be  
18          required to demonstrate to the customer that such additional costs are being incurred  
19          to provide the so-called redundant capacity. This requirement would provide the  
20          customer an opportunity to review and, potentially challenge, the Company's

1 redundant capacity charges pursuant to this tariff. KIUC does not believe that this  
2 change to the redundant capacity tariff is burdensome and would provide customers,  
3 who would otherwise incur these costs, a basis to evaluate whether the Company  
4 will actually incur additional distribution costs associated with the customer's  
5 specific request for service.  
6

7 **Q. What is the third new rider being proposed by the Company in this case?**

8  
9 A. The third rider being proposed by both LG&E and KU is associated with  
10 intermittent and fluctuating loads. Both LG&E and KU have indicated in responses  
11 to KIUC data requests that there were no test year revenues on this rider and that  
12 each of the Companies does not know what the revenues will be in the future.  
13 KIUC does not object to this tariff. However, since the Company has indicated that  
14 it does not know what revenues there will be in the future associated with the tariff,  
15 KIUC proposes that in no event should this tariff be applied to existing loads and  
16 load characteristics for any customer, currently taking service during the test year.  
17 Thus, if the Commission approves this tariff, it would not apply to any existing KU  
18 or LG&E customer unless the customer changed its load or load characteristics from  
19 the level or behavior that occurred during the test year.  
20

1       **Q.    Are there any additional rate design issues that you would like to address?**

2

3       A.    Yes.  KIUC believes that the KU and LGE fuel roll-in procedure should be  
4           modified in a manner that recognizes the differential in fuel costs among rate  
5           schedules on the basis of service voltage.

6

7           In the current case, both KU and LGE have allocated test year fuel expense on the  
8           basis of class energy, adjusted for losses.  This is the appropriate method to assign  
9           cost responsibility for these energy related costs.  However, no such loss  
10          adjustments are made to rolled-in fuel costs during the roll-in of fuel costs to base  
11          rates that occurs periodically for both Companies.  KIUC believes that in future  
12          fuel roll-in proceedings, the Company be required to roll-in fuel costs into base  
13          rates on a voltage differentiated basis, following the concept used by the Company  
14          in this case to allocate fuel expense to rate schedules.

15

16       **Q.    Is KIUC recommending that the fuel clause itself be voltage differentiated?**

17

18       A.    No, not at this time.

19

1                   **IV. INTERRUPTIBLE AND CURTAILABLE SERVICE**

2

3           **Q.    Have you reviewed the Company’s proposal to change the interruptible and**  
4           **curtailable service riders applicable to large commercial and industrial**  
5           **customers?**

6

7           A.    Yes.  LG&E is proposing to eliminate its current interruptible service rider and  
8           replace it with a curtailable service rider (“CSR”).  The LG&E proposal, in addition  
9           to changing the title of the rider, would result in an increase in the current  
10          interruptible credit from \$3.30 per kW for primary customers to \$4.05 per kW and  
11          an increase for transmission customers in the credit from \$3.30 per kW to \$3.98 per  
12          kW.  In addition, the maximum annual hours of interruption is being increased from  
13          250 hours to 500 hours per year.  Finally, the penalty for unauthorized use during an  
14          interruption is being increased from \$15.00 per kW of monthly billing demand to  
15          \$16.00 per kW for each non-compliance request.  This \$16.00 per kW non-  
16          compliance charge would apply to each request for interruption (in the event the  
17          customer failed to comply), as compared to the current penalty charge that applied  
18          on a monthly basis to billing demand, rather than on each non-compliance event.  
19          The Company is also proposing to continue its current 10-minute notice to interrupt  
20          requirement in the tariff.

1  
2 For KU, the proposed changes in the interruptible tariff are more substantial. KU  
3 currently has a curtailable service rider that incorporates two levels of interruption.  
4 For those customers electing a 75 or 100-hour maximum annual interruption level,  
5 the Company is proposing to increase the primary voltage interruptible credit from  
6 \$1.60 per kW to \$4.19 per kW. The transmission credit for these customers would  
7 increase from a \$1.55 per kW to \$4.09 per kW. For customers who elect 150 hours  
8 or 200 hours of maximum annual curtailment, the primary credit would increase  
9 from \$3.20 per kW to \$4.19 per kW, while the transmission voltage credit would  
10 increase from \$3.10 per kW to \$4.09 per kW.

11  
12 However, as in the case of LG&E, the proposed KU CSR tariff permits annual  
13 interruptions of up to 500 hours per year for both primary and transmission voltage  
14 CSR customers. Thus, for these KU customers, the annual maximum hours of  
15 interruption would increase by 250% to 500%.

16  
17 **Q. What is the basis for the Company's proposed CSR credits, applicable to both**  
18 **LG&E and KU?**

1       A.     The Company is proposing to revise its interruptible and curtailable service rates to  
2             reflect a credit based on the avoided cost associated with a simple cycle combustion  
3             turbine. The credit for both LG&E and KU is determined based on the cost of a  
4             new CT and reflects the Company's view that interruptible load is a substitute for  
5             otherwise required peaking capacity.

6  
7       **Q.     Do you believe that the Company's proposed CSR tariff is reasonable, based**  
8             **on its avoided CT cost methodology?**

9  
10      A.     In part. First, as I will discuss subsequently, I do not believe that the Company's  
11             proposed 500 hour maximum potential hours of interruption is reasonable, based on  
12             a review of the Company's expected operation of combustion turbines on the  
13             LG&E/KU system. Second, the Company's proposed 10 minute notice provision,  
14             which appears to reflect the requirement in ECAR for interruptible load to qualify as  
15             spinning reserve, is not reasonable in light of the proposed credit that the Company  
16             is offering. Combustion turbines, even in a hot-start mode, cannot start-up in 10  
17             minutes unless they are already running. Thus, the Company's proposed 10-minute  
18             notice requirement is not reasonable.

19

1 The third concern that I have with the Company's proposal is that it does not offer  
2 curtailable service customers the option of electing to "buy-through" an interruption  
3 at prevailing market rates, if such power is available. Finally, the interruptible credit  
4 should include an additional component to reflect fuel savings provided during  
5 actual interruptions.

6  
7 **Q. Would you please discuss the first concern that you have with the Company's**  
8 **CSR tariff, the increase in the maximum annual hours of potential**  
9 **interruption to 500 hours?**

10  
11 A. The Company is proposing to increase the maximum annualized hours of  
12 interruptions on the LG&E system by 100% (from 250 hours per year to 500 hours  
13 per year), while increasing the KU maximum annual hours of interruption from  
14 either 100 or 200 hours to 500 hours. The Company's proposal appears to be based  
15 on its expectations for the operating characteristics of combustion turbines on its  
16 system.

17  
18 **Q. Have you performed an analysis to determine a reasonable level of annual**  
19 **maximum interruptions that should be reflected in the Company's CSR tariff?**

20

1       A.     Yes. Baron Exhibit \_\_\_\_ (SJB-16) shows an analysis of the actual and expected  
2             operation of the Company's combustion turbine capacity (LG&E and KU  
3             combined) for the test year and for calendar year 2004, based on projections  
4             developed by the Company. As can be seen from this exhibit, during the test year,  
5             the Company's combustion turbines ran from 0 hours per year up to 375 hours per  
6             year. For calendar year 2004, based on production cost simulations prepared by the  
7             Company, the Company's CT's ran from a low of 0 hours per year up to 370 hours  
8             per year for Brown Unit 6. In order to develop a reasonable estimate of the  
9             expectations of the Company's combustion turbine fleet during the test year and the  
10            first rate effective calendar year (2004), I developed an analysis that averaged the  
11            hours of operation of the Company's CTs for the two years, on a mW weighted  
12            basis. The results of that analysis, shown in Exhibit (SJB-16), demonstrate that on  
13            average, the Company's combustion turbine capacity operates at 174 hours per year.  
14            In fact, this value is high because I did not include in the calculation any combustion  
15            turbine capacity whose output in either the test year or in calendar year 2004 is  
16            expected to be 0 hours. If that capacity had been included, the weighted average  
17            hours of CT operation would be much lower.

18

1       **Q.     Under your proposed methodology for determining the appropriate level of**  
2           **maximum annual hours of interruption, are the Company's larger CTs given**  
3           **more weight in the calculation?**

4  
5       A.     Yes. The Company's newer CTs tend to be larger and are weighted at a higher level  
6           in the calculation than the Company's smaller combustion turbines. As shown in  
7           Exhibit (SJB-16), these larger units also have the lowest heat rates, which tend to  
8           drive the operation of these units to a higher level.

9  
10       **Q.     What is your recommendation for modifying the Company's proposed CSR**  
11           **tariff with regard to maximum annual hours of interruption?**

12  
13       A.     Based on the analysis that I prepared, I am recommending that the maximum annual  
14           hours of interruption be set at 175 hours per year, for both LG&E and KU.

15  
16       **Q.     The Company's production cost analysis shows that in future years, beyond**  
17           **2004, some of the Company's CTs will operate in the 400 to 600 hour range**  
18           **annually. Does this information justify the Company's 500 hour maximum**  
19           **hours of interruption?**

20

1       A.     No. These projections are based on production cost simulation model that is, in turn,  
2             based on assumptions regarding load on the system, natural gas prices, market  
3             conditions and other factors. As such, it is reasonable to rely on the test year results  
4             and rate effective period, rather than a longer term forecast for setting rates.

5

6       **Q.     You indicated previously that the Company is proposing to utilize a 10-minute**  
7             **notice requirement for interruption in its KU and LG&E tariffs. Do you**  
8             **believe that this is reasonable?**

9

10       A.     No. Though it is necessary for interruptible load to be curtailed within 10 minutes if  
11             it is qualify as ECAR operating reserve, the Company's interruptible credit does not  
12             provide any compensation to interruptible customers for operating reserve  
13             associated benefits. More significantly, the Company's combustion turbine capacity  
14             cannot start from a cold start or even a hot start within 10 minutes. If standard  
15             combustion turbine capacity is going to provide spinning reserve capability, it must  
16             be running to do so.

17

18             Since the Company's proposed interruptible credit and the philosophy underlying its  
19             CSR tariff is to utilize interruptible load as a substitute for combustion turbine  
20             capacity, it is only reasonable to provide a notice provision for interruption

1 equivalent to the start-up time constraint underlying the Company's combustion  
2 turbines. Also, if the Company were to offer a 10 minute interruption notice option,  
3 then it also should provide customers with the economic benefits (in terms of  
4 avoided costs) provided by substituting interruptible load for resources that would  
5 otherwise be operating to provide operating reserves on the system. For example, if  
6 the Company were utilizing combustion turbine capacity to satisfy a portion of its  
7 spinning reserve requirements, there would be an economic cost associated with  
8 doing so since, presumably, this capacity would have to operate at minimum or  
9 above in order to qualify for spinning reserve. Alternatively, if the Company were  
10 to allocate a portion of its committed units to spinning reserve (by not fully loading  
11 such units in merit order), then there is also an economic cost.

12  
13 **Q. What is your recommendation with regard to the Company's 10-minute notice**  
14 **provision?**

15  
16 A. The Company's CSR tariff should be modified to reflect a notice provision  
17 commensurate with an average expected start-up time the Company's CTs. It is my  
18 understanding that the start-up time for new combustion turbines would be in the  
19 range of 30 minutes for a hot start and up to several hours for a cold start. I would  
20 recommend that the notice provision be modified to a 1 hour notice.

1

2

**Q. You indicated previously that the Company has developed its proposed CSR interruptible credit based on the avoided costs associated with a new combustion turbine. Has the Company fully reflected the avoided cost associated with combustion turbine capacity in its interruptible credit calculation?**

3

4

5

6

7

8

**A.** Not entirely. Though I do not object to the Company's calculation of the fixed combustion turbine costs that would be avoided by interruptible load, the Company has not recognized the economic benefits provided by interruptible load that are associated with fuel savings. Based on the results shown in Exhibit (SJB-16), the mW weighted average heat rate for combustion turbine capacity on the LG&E/KU system is approximately 10,704 Btu per kWh. At a \$5.00 per million Btu cost of natural gas, combustion turbines would have operating costs for each hour that they run equal to about 5 cents per kWh. This is substantially greater than the energy charge in either the LCI-TOD rate on the KU system or the LP-TOD energy charge for LG&E. Since interruptible load, when actually interrupted, will avoid the otherwise applicable operation of a CT (at perhaps 5 cents per kWh), but the customer only saves the energy charge of the otherwise applicable tariff, there is a mismatch between the economic benefits provided and the interruptible credit in

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1 Rate CSR. I am recommending that the Company's CSR tariff be revised to include  
2 an additional credit based on the actual hours of interruption that reflects the fuel  
3 savings provided by interruptible customers, relative to the avoided energy charges  
4 in their otherwise applicable rates.

5  
6 **Q. Do you have any additional changes to the Company's proposed CSR tariff**  
7 **that you recommend?**

8  
9 A. Yes. The final change that I propose to the Company's CSR tariff is the  
10 implementation of a "buy-through" option that would permit customers on Rider  
11 CSR to elect a buy-through of the interruption at market-base rates plus a reasonable  
12 administrative fee payable to the Company. This option would only be available in  
13 the event that the Company elects to interrupt for economic reasons. In the event of  
14 a reliability based interruption, it would not be appropriate to offer the customer a  
15 buy-through of the interruption.

16  
17 This buy-through provision is essentially a right-of-first refusal that the Company  
18 would offer its customers, compared to third party off-system customers for the  
19 energy and capacity otherwise available to serve these interruptible customers.  
20 Essentially, if LG&E or KU would otherwise have to purchase off-system to serve

1 the interruptible load and chooses to interrupt instead, the customer would be  
2 offered the option to specifically pay for these off-system purchases in lieu of  
3 interruption. From the standpoint of the Company, there would be no costs, nor  
4 would there be a cost to the Company's firm customers. As I indicated, the  
5 administrative costs imposed on the Company to actually administer this buy-  
6 through provision should reasonably be recoverable from such customers. In the  
7 event that the Company might be able to make an additional off-system sale and  
8 chooses to interrupt CSR customers, the buy-through provision would amount to the  
9 Company making such sale to the customer directly, for which the customer would  
10 compensate the Company. Again, neither the Company nor its firm customers  
11 would be affected by this provision.

12  
13 **Q. Have you developed an alternative CSR tariff for each of the two operating**  
14 **companies that reflect the changes that you are recommending?**

15  
16 A. Yes. Baron Exhibit \_\_\_\_ (SJB-17), contains the proposed KIUC CSR rider for  
17 Kentucky Utilities, in a redline version. Baron Exhibit \_\_\_\_ (SJB-18) shows a  
18 corresponding CSR for LG&E, reflecting the KIUC recommended modifications as  
19 a redline version.



1       **Q.    Why is the Company proposing to increase the MeadWestvaco contract by an**  
2       **amount greater than the system average increase and the increase being**  
3       **proposed for Rate LCI-TOD?**

4  
5       A.    It was not specifically addressed in testimony. However, based on KU responses to  
6       data requests, it appears that the Company relied on a MeadWestvaco specific cost  
7       analysis in determining the proposed increase.

8  
9       **.Q.    Do you believe that the proposal by KU to increase the MeadWestvaco special**  
10       **contract by 9.53% is reasonable?**

11  
12       A.    No. First of all, the approach that should be used by the Company is to apply the  
13       increase to the special contract class as a whole. As the Company and I have both  
14       shown, the special contract class is paying rates far in excess of cost. Accordingly,  
15       that class should receive a below system average increase. Individual customers  
16       within that class should not be singled out for particularized adverse treatment.  
17       Second the specific cost analysis performed by KU on the MeadWestvaco contract  
18       is incomplete, and thus flawed. A valid cost of service study for a particular special  
19       contract must include all aspects of the contractual relationship between the parties.  
20       In every contract there are benefits and detriments to each party and a valid cost of

1 service study would attempt to take that into account. For example, under the  
2 special contract, MeadWestvaco's self generation options are severely restricted.  
3 Because of the substantial steam generation inherent in the paper production  
4 process, this limitation is costly to MeadWestvaco and represents a corresponding  
5 benefit to KU. Neither KU nor I have attempted to do a complete cost of service  
6 analysis that captures such issues. . That type of complex analysis is ordinarily done  
7 only once; when the Commission initially approves the contract.

8  
9 **Q. Does the KU revenue increase proposal effectively negate the value of the**  
10 **Commission approved special contract to MeadWestvaco?**

11  
12 A. Yes. The MeadWestvaco special contract represents the results of a bargain  
13 between the utility and MeadWestvaco in which mutual consideration was given.  
14 The MeadWestvaco special contract is the only rate option available to this  
15 customer since its plant load exceeds the 50 mw limit contained in the standard  
16 tariff that is otherwise most applicable - LCI-TOD.

17  
18 KU's proposal in this case effectively reduces the difference between the  
19 MeadWestvaco special contract and the most nearly applicable tariff rate, based on  
20 an incomplete cost of service methodology that was not even in effect at the time the

1 contract was negotiated. If this were the standard applicable to setting the special  
2 contract rate, the Company could propose any cost of service study that might  
3 allocate substantial costs to MeadWestvaco and result in a contract rate exceeding  
4 the most nearly comparable tariff rate. By proposing an increase to the  
5 MeadWestvaco special contract rate in excess of the LCI-TOD rate, the Company  
6 has attempted to unilaterally diminish the value of the contract. This is all the more  
7 burdensome because of MeadWestvaco's limited options since its load is too large  
8 for LCI-TOD, as that rate is currently structured. Therefore, the percentage increase  
9 to the MeadWestvaco contract should approximate the percentage increase  
10 approved for the otherwise most nearly applicable tariff rate; which in this case is  
11 LCI-TOD.

12  
13 **Q. Should the LCI-TOD rate be modified to permit a customer whose demands**  
14 **exceed 50 mW to take service under the rate?**

15  
16 A. Yes. Though MeadWestvaco does not desire to shift its special contract load to  
17 LCI-TOD, there is no valid reason why such an option should not be available.  
18 KIUC proposes that the LCI-TOD demand limits be increased to 75 mW, which  
19 would permit MeadWestvaco to take service under this rate, at its option.

1       **Q.    Would you summarize your recommendation regarding the appropriate**  
2       **increase for the MeadWestvaco contract?**

3

4       A.    Each contract in the special contract rate class should receive the same percentage  
5       increase and that increase should be well below system average based upon the class  
6       cost studies and my 25% subsidy reduction proposal.  This proposal results in the  
7       special contract class and the otherwise most nearly applicable tariff, LCI-TOD,  
8       getting nearly the same increase,

9

10      **Q.    Does that complete your testimony?**

11

12      A.    Yes.

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>LOUISVILLE GAS AND ELECTRIC COMPANY</b>	)	<b>2003-00433</b>
	)	
<b>AND</b>	)	
	)	
<b>AN ADJUSTMENT OF THE ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>KENTUCKY UTILITIES COMPANY</b>	)	<b>2003-00434</b>

**EXHIBITS**

**OF**

**STEPHEN J. BARON**

**ON BEHALF OF**

**KENTUCKY INDUSTRIAL USERS COMMITTEE**

**J. KENNEDY AND ASSOCIATES, INC.  
ROSWELL, GEORGIA**

**March 2004**

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

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Expert Testimony Appearances  
of  
Stephen J. Baron  
As of March 2004

<u>Date</u>	<u>Case</u>	<u>Jurisdct.</u>	<u>Party</u>	<u>Utility</u>	<u>Subject</u>
4/81	203(B)	KY	Louisville Gas & Electric Co.	Louisville Gas & Electric Co.	Cost-of-service.
4/81	ER-81-42	MO	Kansas City Power & Light Co.	Kansas City Power & Light Co.	Forecasting.
6/81	U-1933	AZ	Arizona Corporation Commission	Tucson Electric Co.	Forecasting planning.
2/84	8924	KY	Airco Carbide	Louisville Gas & Electric Co.	Revenue requirements, cost-of-service, forecasting, weather normalization.
3/84	84-038-U	AR	Arkansas Electric Energy Consumers	Arkansas Power & Light Co.	Excess capacity, cost-of-service, rate design.
5/84	830470-EI	FL	Florida Industrial Power Users' Group	Florida Power Corp.	Allocation of fixed costs, load and capacity balance, and reserve margin. Diversification of utility.
10/84	84-199-U	AR	Arkansas Electric Energy Consumers	Arkansas Power and Light Co.	Cost allocation and rate design.
11/84	R-842651	PA	Lehigh Valley Power Committee	Pennsylvania Power & Light Co.	Interruptible rates, excess capacity, and phase-in.
1/85	85-65	ME	Airco Industrial Gases	Central Maine Power Co.	Interruptible rate design.
2/85	I-840381	PA	Philadelphia Area Industrial Energy Users' Group	Philadelphia Electric Co.	Load and energy forecast.
3/85	9243	KY	Alcan Aluminum Corp., et al.	Louisville Gas & Electric Co.	Economics of completing fossil generating unit.
3/85	3498-U	GA	Attorney General	Georgia Power Co.	Load and energy forecasting, generation planning economics.
3/85	R-842632	PA	West Penn Power Industrial Intervenor	West Penn Power Co.	Generation planning economics, prudence of a pumped storage hydro unit.
5/85	84-249	AR	Arkansas Electric Energy Consumers	Arkansas Power & Light Co.	Cost-of-service, rate design return multipliers.
5/85		City of Santa	Chamber of Commerce	Santa Clara Municipal	Cost-of-service, rate design.

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<b>Date</b>	<b>Case</b>	<b>Jurisdct.</b>	<b>Party</b>	<b>Utility</b>	<b>Subject</b>
6/85	84-768- E-42T	Clara WV	West Virginia Industrial Intervenors	Monongahela Power Co.	Generation planning economics, prudence of a pumped storage hydro unit.
6/85	E-7 Sub 391	NC	Carolina Industrials (CIGFUR III)	Duke Power Co.	Cost-of-service, rate design, interruptible rate design.
7/85	29046	NY	Industrial Energy Users Association	Orange and Rockland Utilities	Cost-of-service, rate design.
10/85	85-043-U	AR	Arkansas Gas Consumers	Arkla, Inc.	Regulatory policy, gas cost-of- service, rate design.
10/85	85-63	ME	Airco Industrial Gases	Central Maine Power Co.	Feasibility of interruptible rates, avoided cost.
2/85	ER- 8507698	NJ	Air Products and Chemicals	Jersey Central Power & Light Co.	Rate design.
3/85	R-850220	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Optimal reserve, prudence, off-system sales guarantee plan.
2/86	R-850220	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Optimal reserve margins, prudence, off-system sales guarantee plan.
3/86	85-299U	AR	Arkansas Electric Energy Consumers	Arkansas Power & Light Co.	Cost-of-service, rate design, revenue distribution.
3/86	85-726- EL-AIR	OH	Industrial Electric Consumers Group	Ohio Power Co.	Cost-of-service, rate design, interruptible rates.
5/86	86-081- E-GI	WV	West Virginia Energy Users Group	Monongahela Power Co.	Generation planning economics, prudence of a pumped storage hydro unit.
8/86	E-7 Sub 408	NC	Carolina Industrial Energy Consumers	Duke Power Co.	Cost-of-service, rate design, interruptible rates.
10/86	U-17378	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Excess capacity, economic analysis of purchased power.
12/86	38063	IN	Industrial Energy Consumers	Indiana & Michigan Power Co.	Interruptible rates.

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<b>Date</b>	<b>Case</b>	<b>Jurisdct.</b>	<b>Party</b>	<b>Utility</b>	<b>Subject</b>
3/87	EL-86-53-001 EL-86-57-001	Federal Energy Regulatory Commission (FERC)	Louisiana Public Service Commission Staff	Gulf States Utilities, Southern Co.	Cost/benefit analysis of unit power sales contract.
4/87	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Load forecasting and imprudence damages, River Bend Nuclear unit.
5/87	87-023-E-C	WV	Airco Industrial Gases	Monongahela Power Co.	Interruptible rates.
5/87	87-072-E-G1	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Analyze Mon Power's fuel filing and examine the reasonableness of MP's claims.
5/87	86-524-E-SC	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Economic dispatching of pumped storage hydro unit.
5/87	9781	KY	Kentucky Industrial Energy Consumers	Louisville Gas & Electric Co.	Analysis of impact of 1986 Tax Reform Act.
6/87	3673-U	GA	Georgia Public Service Commission	Georgia Power Co.	Economic prudence, evaluation of Vogtle nuclear unit - load forecasting, planning.
6/87	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Phase-in plan for River Bend Nuclear unit.
7/87	85-10-22	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Methodology for refunding rate moderation fund.
8/87	3673-U	GA	Georgia Public Service Commission	Georgia Power Co.	Test year sales and revenue forecast.
9/87	R-850220	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Excess capacity, reliability of generating system.
10/87	R-870651	PA	Duquesne Industrial Intervenors	Duquesne Light Co.	Interruptible rate, cost-of-service, revenue allocation, rate design.
10/87	I-860025	PA	Pennsylvania Industrial Intervenors		Proposed rules for cogeneration, avoided cost, rate recovery.

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Date	Case	Jurisdct.	Party	Utility	Subject
10/87	E-015/ GR-87-223	MN	Taconite Intervenors	Minnesota Power & Light Co.	Excess capacity, power and cost-of-service, rate design.
10/87	8702-EI	FL	Occidental Chemical Corp.	Florida Power Corp.	Revenue forecasting, weather normalization.
12/87	87-07-01	CT	Connecticut Industrial Energy Consumers	Connecticut Light Power Co.	Excess capacity, nuclear plant phase-in.
3/88	10064	KY	Kentucky Industrial Energy Consumers	Louisville Gas & Electric Co.	Revenue forecast, weather normalization rate treatment of cancelled plant.
3/88	87-183-TF	AR	Arkansas Electric Consumers	Arkansas Power & Light Co.	Standby/backup electric rates.
5/88	870171C001	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Cogeneration deferral mechanism, modification of energy cost recovery (ECR).
6/88	870172C005	PA	GPU Industrial Intervenors	Pennsylvania Electric Co.	Cogeneration deferral mechanism, modification of energy cost recovery (ECR).
7/88	88-171- EL-AIR 88-170- EL-AIR Interim Rate Case	OH	Industrial Energy Consumers	Cleveland Electric/ Toledo Edison	Financial analysis/need for interim rate relief.
7/88	Appeal of PSC	19th Judicial Docket U-17282	Louisiana Public Service Commission Circuit Court of Louisiana	Gulf States Utilities	Load forecasting, imprudence damages.
11/88	R-880989	PA	United States Steel	Carnegie Gas	Gas cost-of-service, rate design.
11/88	88-171- EL-AIR 88-170- EL-AIR	OH	Industrial Energy Consumers	Cleveland Electric/ Toledo Edison. General Rate Case.	Weather normalization of peak loads, excess capacity, regulatory policy.
3/89	870216/283 284/286	PA	Armco Advanced Materials Corp., Allegheny Ludlum Corp.	West Penn Power Co.	Calculated avoided capacity, recovery of capacity payments.

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Date	Case	Jurisdiction	Party	Utility	Subject
8/89	8555	TX	Occidental Chemical Corp.	Houston Lighting & Power Co.	Cost-of-service, rate design.
8/89	3840-U	GA	Georgia Public Service Commission	Georgia Power Co.	Revenue forecasting, weather normalization.
9/89	2087	NM	Attorney General of New Mexico	Public Service Co. of New Mexico	Prudence - Palo Verde Nuclear Units 1, 2 and 3, load forecasting.
10/89	2262	NM	New Mexico Industrial Energy Consumers	Public Service Co. of New Mexico	Fuel adjustment clause, off-system sales, cost-of-service, rate design, marginal cost.
11/89	38728	IN	Industrial Consumers for Fair Utility Rates	Indiana Michigan Power Co.	Excess capacity, capacity equalization, jurisdictional cost allocation, rate design, interruptible rates.
1/90	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Jurisdictional cost allocation, O&M expense analysis.
5/90	890366	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Non-utility generator cost recovery.
6/90	R-901609	PA	Armco Advanced Materials Corp., Allegheny Ludlum Corp.	West Penn Power Co.	Allocation of QF demand charges in the fuel cost, cost-of-service, rate design.
9/90	8278	MD	Maryland Industrial Group	Baltimore Gas & Electric Co.	Cost-of-service, rate design, revenue allocation.
12/90	U-9346 Rebuttal	MI	Association of Businesses Advocating Tariff Equity	Consumers Power Co.	Demand-side management, environmental externalities.
12/90	U-17282 Phase IV	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Revenue requirements, jurisdictional allocation.
12/90	90-205	ME	Airco Industrial Gases	Central Maine Power Co.	Investigation into interruptible service and rates.
1/91	90-12-03 Interim	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Interim rate relief, financial analysis, class revenue allocation.

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<b>Date</b>	<b>Case</b>	<b>Jurisdic.</b>	<b>Party</b>	<b>Utility</b>	<b>Subject</b>
5/91	90-12-03 Phase II	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Revenue requirements, cost-of- service, rate design, demand-side management.
8/91	E-7, SUB SUB 487	NC	North Carolina Industrial Energy Consumers	Duke Power Co.	Revenue requirements, cost allocation, rate design, demand- side management.
8/91	8341 Phase I	MD	Westvaco Corp.	Potomac Edison Co.	Cost allocation, rate design, 1990 Clean Air Act Amendments.
8/91	91-372  EL-UNC	OH	Armco Steel Co., L.P.	Cincinnati Gas &  Electric Co.	Economic analysis of  cogeneration, avoid cost rate.
9/91	P-910511 P-910512	PA	Allegheny Ludlum Corp., Armco Advanced Materials Co., The West Penn Power Industrial Users' Group	West Penn Power Co.	Economic analysis of proposed CWIP Rider for 1990 Clean Air Act Amendments expenditures.
9/91	91-231 -E-NC	WV	West Virginia Energy Users' Group	Monongahela Power Co.	Economic analysis of proposed CWIP Rider for 1990 Clean Air Act Amendments expenditures.
10/91	8341 - Phase II	MD	Westvaco Corp.	Potomac Edison Co.	Economic analysis of proposed CWIP Rider for 1990 Clean Air Act Amendments expenditures.
10/91	U-17282	LA	Louisiana Public Service Commission Staff	Gulf States Utilities	Results of comprehensive management audit.
Note: No testimony was prefiled on this.					
11/91	U-17949 Subdocket A	LA	Louisiana Public Service Commission Staff	South Central Bell Telephone Co. and proposed merger with Southern Bell Telephone Co.	Analysis of South Central Bell's restructuring and
12/91	91-410- EL-AIR	OH	Armco Steel Co., Air Products & Chemicals, Inc.	Cincinnati Gas & Electric Co.	Rate design, interruptible rates.
12/91	P-880286	PA	Armco Advanced Materials Corp., Allegheny Ludlum Corp.	West Penn Power Co.	Evaluation of appropriate avoided capacity costs - QF projects.

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<b>Date</b>	<b>Case</b>	<b>Jurisdct.</b>	<b>Party</b>	<b>Utility</b>	<b>Subject</b>
1/92	C-913424	PA	Duquesne Interruptible Complainants	Duquesne Light Co.	Industrial interruptible rate.
6/92	92-02-19	CT	Connecticut Industrial Energy Consumers	Yankee Gas Co.	Rate design.
8/92	2437	NM	New Mexico Industrial Intervenors	Public Service Co. of New Mexico	Cost-of-service.
8/92	R-00922314	PA	GPU Industrial Intervenors	Metropolitan Edison Co.	Cost-of-service, rate design, energy cost rate.
9/92	39314	ID	Industrial Consumers for Fair Utility Rates	Indiana Michigan Power Co.	Cost-of-service, rate design, energy cost rate, rate treatment.
10/92	M-00920312 C-007	PA	The GPU Industrial Intervenors	Pennsylvania Electric Co.	Cost-of-service, rate design, energy cost rate, rate treatment.
12/92	U-17949	LA	Louisiana Public Service Commission Staff	South Central Bell Co.	Management audit.
12/92	R-00922378	PA	Armco Advanced Materials Co. The WPP Industrial Intervenors	West Penn Power Co.	Cost-of-service, rate design, energy cost rate, SO <sub>2</sub> allowance rate treatment.
1/93	8487	MD	The Maryland Industrial Group	Baltimore Gas & Electric Co.	Electric cost-of-service and rate design, gas rate design (flexible rates).
2/93	E002/GR-92-1185	MN	North Star Steel Co. Praxair, Inc.	Northern States Power Co.	Interruptible rates.
4/93	EC92 21000 ER92-806-000 (Rebuttal)	Federal Energy Regulatory Commission	Louisiana Public Service Commission Staff	Gulf States Utilities/Entergy agreement.	Merger of GSU into Entergy System; impact on system
7/93	93-0114-E-C	WV	Airco Gases	Monongahela Power Co.	Interruptible rates.
8/93	930759-EG	FL	Florida Industrial Power Users' Group	Generic - Electric Utilities	Cost recovery and allocation of DSM costs.
9/93	M-009 30406	PA	Lehigh Valley Power Committee	Pennsylvania Power & Light Co.	Ratemaking treatment of off-system sales revenues.

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of  
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As of March 2004

Date	Case	Jurisdct.	Party	Utility	Subject
11/93	346	KY	Kentucky Industrial Utility Customers	Generic - Gas Utilities	Allocation of gas pipeline transition costs - FERC Order 636.
12/93	U-17735	LA	Louisiana Public Service Commission Staff	Cajun Electric Power Cooperative	Nuclear plant prudence, forecasting, excess capacity.
4/94	E-015/ GR-94-001	MN	Large Power Intervenors	Minnesota Power Co.	Cost allocation, rate design, rate phase-in plan.
5/94	U-20178	LA	Louisiana Public Service Commission	Louisiana Power & Light Co.	Analysis of least cost integrated resource plan and demand-side management program.
7/94	R-00942986	PA	Armco, Inc.; West Penn Power Industrial Intervenors	West Penn Power Co.	Cost-of-service, allocation of rate increase, rate design, emission allowance sales, and operations and maintenance expense.
7/94	94-0035- E-42T	WV	West Virginia Energy Users Group	Monongahela Power Co.	Cost-of-service, allocation of rate increase, and rate design.
8/94	EC94 13-000	Federal Energy Regulatory Commission	Louisiana Public Service Commission	Gulf States Utilities/Entergy	Analysis of extended reserve shutdown units and violation of system agreement by Entergy.
9/94	R-00943 081 R-00943 081C0001	PA	Lehigh Valley Power Committee	Pennsylvania Public Utility Commission	Analysis of interruptible rate terms and conditions, availability.
9/94	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative	Evaluation of appropriate avoided cost rate.
9/94	U-19904	LA	Louisiana Public Service Commission	Gulf States Utilities	Revenue requirements.
10/94	5258-U	GA	Georgia Public Service Commission	Southern Bell Telephone & Telegraph Co.	Proposals to address competition in telecommunication markets.
11/94	EC94-7-000 ER94-898-000	FERC	Louisiana Public Service Commission	El Paso Electric and Central and Southwest	Merger economics, transmission equalization hold harmless proposals.
2/95	941-430EG	CO	CF&I Steel, L.P.	Public Service Company of Colorado	Interruptible rates, cost-of-service.

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As of March 2004

Date	Case	Jurisdiction	Party	Utility	Subject
4/95	R-00943271	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Cost-of-service, allocation of rate increase, rate design, interruptible rates.
6/95	C-00913424 C-00946104	PA	Duquesne Interruptible Complainants	Duquesne Light Co.	Interruptible rates.
8/95	ER95-112 -000	FERC	Louisiana Public Service Commission	Entergy Services, Inc.	Open Access Transmission Tariffs - Wholesale.
10/95	U-21485	LA	Louisiana Public Service Commission	Gulf States Utilities Company	Nuclear decommissioning, revenue requirements, capital structure.
10/95	ER95-1042 -000	FERC	Louisiana Public Service Commission	System Energy Resources, Inc.	Nuclear decommissioning, revenue requirements.
10/95	U-21485	LA	Louisiana Public Service Commission	Gulf States Utilities Co.	Nuclear decommissioning and cost of debt capital, capital structure.
11/95	I-940032	PA	Industrial Energy Consumers of Pennsylvania	State-wide - all utilities	Retail competition issues.
7/96	U-21496	LA	Louisiana Public Service Commission	Central Louisiana Electric Co.	Revenue requirement analysis.
7/96	8725	MD	Maryland Industrial Group	Baltimore Gas & Elec. Co., Potomac Elec. Power Co., Constellation Energy Co.	Ratemaking issues associated with a Merger.
8/96	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative	Revenue requirements.
9/96	U-22092	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Decommissioning, weather normalization, capital structure.
2/97	R-973877	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Competitive restructuring policy issues, stranded cost, transition charges.
6/97	Civil Action No. 94-11474	US Bankruptcy Court Middle District of Louisiana	Louisiana Public Service Commission	Cajun Electric Power Cooperative	Confirmation of reorganization plan; analysis of rate paths produced by competing plans.

**Expert Testimony Appearances  
of  
Stephen J. Baron  
As of March 2004**

<b>Date</b>	<b>Case</b>	<b>Jurisdict.</b>	<b>Party</b>	<b>Utility</b>	<b>Subject</b>
6/97	R-973953	PA	Philadelphia Area Industrial Energy Users Group	PECO Energy Co.	Retail competition issues, rate unbundling, stranded cost analysis.
6/97	8738	MD	Maryland Industrial Group	Generic	Retail competition issues
7/97	R-973954	PA	PP&L Industrial Customer Alliance	Pennsylvania Power & Light Co.	Retail competition issues, rate unbundling, stranded cost analysis.
10/97	97-204	KY	Alcan Aluminum Corp. Southwire Co.	Big River Electric Corp.	Analysis of cost of service issues - Big Rivers Restructuring Plan
10/97	R-974008	PA	Metropolitan Edison Industrial Users	Metropolitan Edison Co.	Retail competition issues, rate unbundling, stranded cost analysis.
10/97	R-974009	PA	Pennsylvania Electric Industrial Customer	Pennsylvania Electric Co.	Retail competition issues, rate unbundling, stranded cost analysis.
11/97	U-22491	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Decommissioning, weather normalization, capital structure.
11/97	P-971265	PA	Philadelphia Area Industrial Energy Users Group	Enron Energy Services Power, Inc./ PECO Energy	Analysis of Retail Restructuring Proposal.
12/97	R-973981	PA	West Penn Power Industrial Intervenors	West Penn Power Co.	Retail competition issues, rate unbundling, stranded cost analysis.
12/97	R-974104	PA	Duquesne Industrial Intervenors	Duquesne Light Co.	Retail competition issues, rate unbundling, stranded cost analysis.
3/98 (Allocated Stranded Cost Issues)	U-22092	LA	Louisiana Public Service Commission	Gulf States Utilities Co.	Retail competition, stranded cost quantification.
3/98	U-22092		Louisiana Public Service Commission	Gulf States Utilities, Inc.	Stranded cost quantification, restructuring issues.
9/98	U-17735		Louisiana Public Service Commission	Cajun Electric Power Cooperative, Inc.	Revenue requirements analysis, weather normalization.
12/98	8794	MD	Maryland Industrial Group and	Baltimore Gas and Electric Co.	Electric utility restructuring, stranded cost recovery, rate

Expert Testimony Appearances  
of  
Stephen J. Baron  
As of March 2004

Date	Case	Jurisdic.	Party	Utility	Subject
			Millennium Inorganic Chemicals Inc.		unbundling.
12/98	U-23358	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Nuclear decommissioning, weather normalization, Entergy System Agreement.
5/99 (Cross- 40-000 Answering Testimony)	EC-98-	FERC	Louisiana Public Service Commission	American Electric Power Co. & Central South West Corp.	Merger issues related to market power mitigation proposals.
5/99 (Response Testimony)	98-426	KY	Kentucky Industrial Utility Customers, Inc.	Louisville Gas & Electric Co.	Performance based regulation, settlement proposal issues, cross-subsidies between electric. gas services.
6/99	98-0452	WV	West Virginia Energy Users Group	Appalachian Power, Monongahela Power, & Potomac Edison Companies	Electric utility restructuring, stranded cost recovery, rate unbundling.
7/99	99-03-35	CT	Connecticut Industrial Energy Consumers	United Illuminating Company	Electric utility restructuring, stranded cost recovery, rate unbundling.
7/99	Adversary Proceeding No. 98-1065	U.S. Bankruptcy Court	Louisiana Public Service Commission	Cajun Electric Power Cooperative	Motion to dissolve preliminary injunction.
7/99	99-03-06	CT	Connecticut Industrial Energy Consumers	Connecticut Light & Power Co.	Electric utility restructuring, stranded cost recovery, rate unbundling.
10/99	U-24182	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Nuclear decommissioning, weather normalization, Entergy System Agreement.
12/99	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative, Inc.	Analysis of Proposed Contract Rates, Market Rates.
03/00	U-17735	LA	Louisiana Public Service Commission	Cajun Electric Power Cooperative, Inc.	Evaluation of Cooperative Power Contract Elections
03/00	99-1658-EL-ETP	OH	AK Steel Corporation	Cincinnati Gas & Electric Co.	Electric utility restructuring, stranded cost recovery, rate Unbundling.

**Expert Testimony Appearances  
of  
Stephen J. Baron  
As of March 2004**

<b>Date</b>	<b>Case</b>	<b>Jurisdct.</b>	<b>Party</b>	<b>Utility</b>	<b>Subject</b>
08/00	98-0452 E-GI 98-0452 E-GI	WVA	West Virginia Energy Users Group	Appalachian Power Co. American Electric Co.	Electric utility restructuring rate unbundling.
08/00	00-1050 E-T 00-1051-E-T	WVA	West Virginia Energy Users Group	Mon Power Co. Potomac Edison Co.	Electric utility restructuring rate unbundling.
10/00	SOAH 473- 00-1020 PUC 2234	TX	The Dallas-Fort Worth Hospital Council and The Coalition of Independent Colleges And Universities	TXU, Inc.	Electric utility restructuring rate unbundling.
12/00	U-24993	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Nuclear decommissioning, revenue requirements.
12/00	EL00-66- 000 & ER-2854-000 EL95-33-002	LA	Louisiana Public Service Commission	Entergy Services Inc.	Inter-Company System Agreement: Modifications for retail competition, interruptible load.
04/01	U-21453, U-20925, U-22092 (Subdocket B) Addressing Contested Issues	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Jurisdictional Business Separation - Texas Restructuring Plan
10/01	14000-U	GA	Georgia Public Service Commission Adversary Staff	Georgia Power Co.	Test year revenue forecast.
11/01	U-25687	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Nuclear decommissioning requirements transmission revenues.
11/01	U-25965	LA	Louisiana Public Service Commission	Generic .	Independent Transmission Company ("Transco"). RTO rate design.
03/02	001148-EI	FL	South Florida Hospital and Healthcare Assoc.	Florida Power & Light Company	Retail cost of service, rate design, resource planning and demand side management.
06/02	U-25965	LA	Louisiana Public Service Commission	Entergy Gulf States Entergy Louisiana	RTO Issues
07/02	U-21453	LA	Louisiana Public Service Commission	SWEPCO, AEP	Jurisdictional Business Sep. - Texas Restructuring Plan.

**Expert Testimony Appearances  
of  
Stephen J. Baron  
As of March 2004**

<b>Date</b>	<b>Case</b>	<b>Jurisdict.</b>	<b>Party</b>	<b>Utility</b>	<b>Subject</b>
08/02	U-25888	LA	Louisiana Public Service Commission	Entergy Louisiana, Inc. Entergy Gulf States, Inc.	Modifications to the Inter-Company System Agreement, Production Cost Equalization.
08/02	EL01-88-000	FERC	Louisiana Public Service Commission	Entergy Services Inc. and The Entergy Operating Companies	Modifications to the Inter-Company System Agreement, Production Cost Equalization.
11/02	02S-315EG	CO	CF&I Steel & Climax Molybdenum Co.	Public Service Co. of Colorado	Fuel Adjustment Clause
01/03	U-17735	LA	Louisiana Public Service Commission	Louisiana Coops	Contract Issues
02/03	02S-594E	CO	Cripple Creek and Victor Gold Mining Co.	Aquila, Inc.	Revenue requirements, purchased power.
04/03	U-26527	LA	Louisiana Public Service Commission	Entergy Gulf States, Inc.	Weather normalization, power purchase expenses, System Agreement expenses.
11/03	ER03-753-000	FERC	Louisiana Public Service Commission Staff	Entergy Services, Inc. and the Entergy Operating Companies	Proposed modifications to System Agreement Tariff MSS-4.
11/03	ER03-583-000, FERC ER03-583-001, and ER03-583-002  ER03-681-000, ER03-681-001  ER03-682-000, ER03-682-001, and ER03-682-002	FERC	Louisiana Public Service Commission	Entergy Services, Inc., the Entergy Operating Companies, EWO Marketing, L.P., and Entergy Power, Inc.	Evaluation of Wholesale Purchased Power Contracts.
12/03	U-27136	LA	Louisiana Public Service Commission	Entergy Louisiana, Inc.	Evaluation of Wholesale Purchased Power Contracts.
01/04	E-01345-03-0437	AZ	Kroger Company	Arizona Public Service Co.	Revenue allocation rate design.
02/04	00032071	PA	Duquesne Industrial Intervenors	Duquesne Light Company	Provider of last resort issues.
03/04	03A-436E	CO	CF&I Steel, LP and Climax Molybdenum	Public Service Company of Colorado	Purchased Power Adjustment Clause.

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**J. KENNEDY AND ASSOCIATES, INC.**





KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Combined Light & Power LPS	Combined Light & Power LPP	Combined Light & Power LFT	Large TOD Primary LCLP	Large TOD Transmission LCOT	High Load Factor Secondary HLFS	High Load Factor Primary HLEP
<b>Cost of Service Summary – Pro-Forms</b>										
<b>Operating Revenues</b>										
Total Operating Revenue – Actual				\$ 177,000,631	\$ 38,786,392	\$ 602,350	\$ 75,082,958	\$ 21,281,348	\$ 13,981,260	\$ 26,319,442
Pro-Forms Adjustments:										
Eliminate unbilled revenue				\$ 154,859	\$ 34,715	\$ 526	\$ 64,896	\$ 18,376	\$ 12,117	\$ 22,783
Adjustment for mismatch in fuel cost recovery				\$ (8,518,255)	\$ (2,083,467)	\$ (31,817)	\$ (4,365,021)	\$ (1,268,707)	\$ (801,803)	\$ (1,517,304)
Adjustment to Reflect Full Year of FAC Roll-in				\$ 365,749	\$ 85,293	\$ 2,524	\$ 194,737	\$ 94,994	\$ 53,861	\$ 62,861
Remove ECR revenues		FACRI		\$ (5,734,057)	\$ (1,290,905)	\$ (19,498)	\$ (2,401,012)	\$ (686,721)	\$ (446,972)	\$ (838,688)
Adjustment to reflect Full Year of ECR Roll-in		ECPREV		\$ 4,133,949	\$ 917,554	\$ 14,085	\$ 1,735,487	\$ 492,058	\$ 316,548	\$ 606,185
Remove off-system ECR revenues		ECRRI		\$ (187,224)	\$ (39,075)	\$ (583)	\$ (76,777)	\$ (20,709)	\$ (13,584)	\$ (26,230)
Eliminate brokered sales		PLPPT		\$ (5,358,526)	\$ (1,316,924)	\$ (19,889)	\$ (2,745,877)	\$ (798,088)	\$ (504,385)	\$ (854,481)
Eliminate ESM revenues collected		Energy		\$ (1,192,341)	\$ (264,123)	\$ (3,814)	\$ (474,129)	\$ (137,016)	\$ (89,283)	\$ (160,668)
Eliminate ESM, FAC, ECR from rate refund acct		ESMREV		\$ 373,980	\$ 83,837	\$ 1,271	\$ 156,727	\$ 44,379	\$ 29,263	\$ 55,022
Year end adjustment		R01		\$ (96,441)	\$ (12,123)	\$ (472)	\$ -	\$ -	\$ -	\$ -
Merger savings		DSMREV		\$ (597,774)	\$ 17,795	\$ 273,166	\$ (246,535)	\$ (69,809)	\$ (46,031)	\$ (86,551)
Adjustment for rate switching, increased interruptible credit		YREND		\$ (588,297)	\$ (131,879)	\$ (2,000)	\$ (64,186)	\$ (120,783)	\$ 1,514	\$ 2,828
VDT Amortization and Surcredit		RATESW		\$ 19,479	\$ 4,382	\$ 65	\$ 8,140	\$ 2,384	\$ -	\$ -
Total Pro-Forms Operating Revenue				\$ 159,833,741	\$ 35,818,617	\$ 816,116	\$ 66,869,408	\$ 18,829,635	\$ 12,492,305	\$ 22,847,608
				(13,497,703)						

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Coal Mining Power		Large Power Mine		Large Power Mine		Combination Off-Peak CWH			
				Primary MPP	Transmission MPT	Power TOD LMP	Primary LMP	Transmission LMP					
<b>Cost of Service Summary – Pro-Forma</b>													
<b>Operating Revenues</b>													
Total Operating Revenue – Actual				\$	5,648,828	\$	4,556,273	\$	2,206,126	\$	5,430,525	\$	502,279
Pro-Forma Adjustments:													
Eliminate unbilled revenue				\$	4,976	\$	3,978	\$	1,924	\$	4,748	\$	432
Adjustment for Mismatch in fuel cost recovery			R01 Energy	\$	(269,036)	\$	(234,296)	\$	(118,074)	\$	(276,463)	\$	(28,144)
Adjustment to Reflect Full Year of FAC Roll-in		FACRI		\$	12,843	\$	13,496	\$	2,865	\$	11,438	\$	1,179
Remove ECR revenues		ECRREV		\$	(182,407)	\$	(145,445)	\$	(70,105)	\$	(172,666)	\$	(15,723)
Adjustment to reflect Full Year of ECR Roll-in		ECRRI		\$	132,466	\$	105,333	\$	51,614	\$	127,076	\$	11,770
Remove off-system ECR revenues			PLPPT Energy	\$	(5,165)	\$	(4,531)	\$	(2,123)	\$	(5,583)	\$	(637)
Eliminate brokered sales				\$	(168,512)	\$	(147,387)	\$	(74,276)	\$	(173,926)	\$	(17,704)
Eliminate ESM revenues collected		ESMREV		\$	(33,089)	\$	(25,314)	\$	(11,418)	\$	(28,011)	\$	(2,590)
Eliminate ESM FAC ECR from rate refund acct.		DSMREV		\$	12,018	\$	9,606	\$	4,648	\$	11,466	\$	1,042
Year end adjustment		YREND		\$	(234,645)	\$	(275,257)	\$	(7,311)	\$	(703,778)	\$	(22,542)
Merger savings			R01	\$	(18,905)	\$	(15,111)	\$	-	\$	(18,037)	\$	(1,639)
Adjustment for rate switching, increased interruptible credit		RATESW		\$	619	\$	493	\$	236	\$	579	\$	52
VDT Amortization and Surcredit			VDTREV	\$	(13,497,703)	\$	3,640,839	\$	1,984,106	\$	4,207,348	\$	427,775
Total Pro-Forma Operating Revenue				\$	4,900,693	\$	3,640,839	\$	1,984,106	\$	4,207,348	\$	427,775

BIP Prod Trans Allocation  
 Corrected Demand Allocators  
 Removes ECR Rate Base  
 Present Revenues Reflect CSR Iner  
 Allocates CSR Credits on SCP



KENTUCKY UTILITIES  
Cost of Service Study  
Class Allocation  
12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate RS	All Electric Residential Rate FERS	General Service Secondary GSS	General Service Primary GSP
<b>Operating Expenses</b>								
Operation and Maintenance Expenses				548,721,322 \$	106,395,052 \$	115,314,028 \$	44,174,222 \$	1,487,883
Depreciation and Amortization Expenses				88,376,624	19,523,170	23,225,147	8,502,560	201,876
Regulatory Credits and Accretion Expenses				(8,655,053)	(1,437,613)	(2,143,031)	(632,221)	(25,292)
Property Taxes				8,211,450	1,794,460	2,152,328	782,026	18,984
Other Taxes				5,761,996	1,259,177	1,510,435	548,750	13,321
Gain Disposition of Allowances				(246,288)	(39,277)	(45,226)	(16,427)	(750)
State and Federal Income Taxes				26,916,595 \$	(931,127) \$	(2,033,485) \$	4,158,791 \$	378,191
Specific Assignment of Curtilable Service Rider Credit				(4,582,475)				
Allocation of Curtilable Service Rider Credits				4,582,475 \$	934,980 \$	771,344 \$	449,462 \$	11,972
Adjustments to Operating Expenses:								
Eliminate mismatch in fuel cost recovery				(31,644,777)	(5,046,623)	(5,810,987)	(2,110,884)	(86,419)
Remove ECR expenses				(248,468)	(45,272)	(46,795)	(22,742)	(908)
Eliminate brokered sales expenses				(24,729,742)	(3,943,632)	(4,541,167)	(1,649,456)	(75,349)
Eliminate DSM Expenses				(1,510,632)	(2,946,471)	(1,090,913)	(223,001)	(10,756)
Year end adjustment				151,410	(251,488)	1,068,029	491,740	
Depreciation adjustment								
Adjustment for change in depreciation rate				2,091,278	461,982	549,592	201,269	4,777
Labor adjustment				1,002,076	247,020	292,112	100,391	2,144
Medical Expenses (See Functional Assignment)								
Adjustment for pension/retir benefit. (See Functional Assignment)				(473,014)	(168,017)	(153,325)	(69,375)	(554)
Storm damage adjustment								
Eliminate advertising expenses (See Functional Assignment)				58,333	10,564	11,159	5,351	218
Adjustment for amortization of ESM audit expense				352,456	66,340	74,069	28,374	956
Amortization of rate case expenses								
Remove Amortization of one-utility costs (See Functional Assignment)								
Adjustment for injuries and damages account 925 (See Functional Assignment)				2,865,000	713,643	728,353	290,030	6,195
Adjustment for VDT net savings to shareholders				19,966,825	4,675,980	4,772,367	1,900,355	40,581
Adjustment for merger savings				(2,726,510)	(672,108)	(695,963)	(273,150)	(5,834)
Adjustment for MISO schedule 10 expenses				843,344	140,064	208,792	61,596	2,464
Adjustment for effect of accounting change				8,434,618	1,863,281	2,216,596	811,766	19,267
Adjustment for IT staff reduction				(601,682)	(148,320)	(151,377)	(60,278)	(1,288)
Adjustment to remove Alstom expenses				(3,126,995)	(619,337)	(774,169)	(228,390)	(9,137)
Adjustment for corporate lease expense								
Adjustment for sales tax refund				120,391	21,803	23,030	11,043	451
Adjustment for OMI Nox expense				1,959,879	325,500	485,219	143,146	5,726
Adjustment for ice storm				(5,277,336)	(1,874,536)	(1,710,617)	(774,008)	(9,178)
Adjustment for management audit fee				163,982	31,796	34,461	13,201	443
Adjustment for Retirement of Green River Units 1 & 2				(705,035)	(115,317)	(135,875)	(48,242)	(2,113)
VDT Amortization and Surcredit				(466,280)	(84,947)	(88,836)	(42,731)	(1,661)
Total Expense Adjustments				(35,904,718)	(5,820,456)	(4,786,255)	(1,444,794)	(126,962)
Total Operating Expenses				633,160,928 \$	121,678,365 \$	133,996,064 \$	56,525,369 \$	1,959,223
Net Operating Income (Adjusted)				60,269,011 \$	2,667,204 \$	1,786,429 \$	8,199,229 \$	626,432
Net Cost Rate Base				1,412,033,543 \$	318,616,683 \$	371,840,037 \$	139,068,150 \$	3,144,534
<b>Rate of Return</b>				<b>4.27%</b>	<b>0.84%</b>	<b>0.45%</b>	<b>5.96%</b>	<b>19.92%</b>

BIP Prod Trans Allocation  
Corrected Demand Allocations  
Removes ECR Rate Base  
Present Revenues Reflect CSR Incr  
Allocates CSR Credits on SCP

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Combined Light & Power		Combined Light & Power		Large Commlnd TOD		Large Commlnd TOD		High Load Factor		High Load Factor	
				LPS	LPP	LPT	LCP	LCT	LCP	LCT	HLFS	HLFP	HLFS	HLFP	
<b>Operating Expenses</b>															
Operation and Maintenance Expenses				118,555,031	26,795,526	396,971	54,387,992	15,141,209	9,976,981	1,141,137	18,809,670				
Depreciation and Amortization Expenses				15,264,780	3,243,751	43,985	6,274,319	1,547,803	1,141,137	(151,439)	2,128,807				
Regulatory Credits and Accretion Expenses				(1,864,336)	(435,639)	(6,505)	(855,965)	(230,883)	(151,439)	107,660	(292,427)				
Property Taxes				1,433,504	306,242	4,177	592,905	147,074	107,660	141,217	201,249				
Other Taxes				1,065,693	214,691	2,931	416,043	103,202	75,545	141,217	201,249				
Gain Disposition of Allowances				(86,459)	(14,367)	(217)	(29,956)	(8,707)	(5,503)	(10,413)	(10,413)				
State and Federal Income Taxes				11,964,223	2,866,184	91,959	3,504,648	1,463,006	772,961	1,368,681	1,368,681				
Specific Assignment of Curialiable Service Rider Credit				(161,361)	(240,238)	4,049	(271,654)	(469,037)							
Allocation of Curialiable Service Rider Credits				1,097,059	240,238	4,049	441,260	101,228	76,321	145,724	145,724				
Adjustments to Operating Expenses:															
Eliminate mismatch in fuel cost recovery				(7,511,155)	(1,845,859)	(27,879)	(3,848,951)	(1,116,710)	(707,007)	(4,435)	(1,337,916)				
Remove ECR expenses				(56,898)	(12,809)	(193)	(23,825)	(6,834)	(652,511)	(8,322)	(1,045,554)				
Eliminate brokered sales expenses				(5,869,813)	(1,442,579)	(21,787)	(3,007,876)	(874,249)							
Eliminate DSM Expenses				(98,559)	(12,138)	(473)									
Year end adjustment				(360,354)	71,010	164,672									
Depreciation adjustment				361,214	76,758	1,041	148,471	36,626	27,003	50,374	50,374				
Adjustment for change in depreciation rate				179,334	32,574	438	63,114	16,111	11,823	21,741	21,741				
Medical Expense (See Functional Assignment)															
Adjustment for pension/post ratir benefit (See Functional Assignment)				(42,357)	(5,656)		(9,718)								
Storm damage adjustment															
Eliminate advertising expenses (See Functional Assignment)				13,383	3,000	45	5,608	1,588	1,047	1,960	1,960				
Adjustment for amortization of ESM audit expense				76,151	17,211	255	34,935	9,726	6,408	12,576	12,576				
Amortization of rate case expenses															
Remove Amortization of one-utility costs (See Functional Assignment)															
Adjustment for VDT net savings to shareholders				518,096	94,107	1,266	182,338	46,544	34,157	62,610	62,610				
Adjustment for merger savings				3,394,708	616,612	9,296	1,194,727	304,969	223,806	411,550	411,550				
Adjustment for merger amortization expenses				(487,943)	(88,630)	(1,182)	(171,726)	(43,835)	(32,169)	(59,155)	(59,155)				
Adjustment for MISO schedule 10 expenses				181,639	42,444	634	83,395	22,494	14,754	28,491	28,491				
Adjustment for effect of accounting change				1,456,863	309,582	4,198	598,818	147,722	108,910	203,172	203,172				
Adjustment for IT staff reduction				(107,678)	(19,559)	(263)	(309,217)	(83,406)	(54,707)	(105,639)	(105,639)				
Adjustment to remove Alstom expenses				(673,490)	(157,374)	(2,350)									
Adjustment for corporate lease expense				27,620	6,182	94	11,575	3,278	2,161	4,064	4,064				
Adjustment for sales tax refund				422,118	98,636	1,473	193,805	52,276	34,288	66,211	66,211				
Adjustment for OMI Nox expense				(472,573)	(63,088)		(108,426)		(25,051)	(33,566)	(33,566)				
Adjustment for ice storm				35,429	8,008	119	16,254	4,525	2,982	5,618	5,618				
Adjustment for management audit fee				(164,951)	(39,950)	(607)	(81,996)	(23,318)	(14,958)	(28,556)	(28,556)				
Adjustment for Retirement of Green River Units 1 & 2				(106,432)	(23,944)	(363)	(44,478)	(12,782)	(8,271)	(15,454)	(15,454)				
VDT Amortization and Surcredit				(9,285,690)	(2,335,563)	127,424	(5,111,070)	(1,526,920)	(941,114)	(2,106,803)	(2,106,803)				
Total Expense Adjustments				138,112,005	30,699,881	664,794	59,646,521	16,237,976	11,064,549	20,377,504	20,377,504				
Total Operating Expenses				21,721,736	5,116,735	151,332	7,220,887	2,591,659	1,437,756	2,570,104	2,570,104				
Net Operating Income (Adjusted)				239,144,564	50,208,069	672,621	97,104,812	23,755,976	17,747,416	32,944,387	32,944,387				
Net Cost Rate Base															
<b>Rate of Return</b>				<b>9.03%</b>	<b>10.20%</b>	<b>22.50%</b>	<b>7.44%</b>	<b>10.91%</b>	<b>8.10%</b>	<b>7.80%</b>					

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Coal Mining Power Primary MPP	Coal Mining Power Transmission MPT	Large Power Mine Power TOD Primary LMPP	Large Power Mine Power TOD Transmission LMPT	Combination Off-Peak CWH
<b>Operating Expenses</b>								
Operation and Maintenance Expenses				3,428,058 \$	2,916,973 \$	1,481,351 \$	3,478,565 \$	1,174,358
Depreciation and Amortization Expenses				435,106	340,395	180,928	418,249	274,136
Regulatory Credits and Accretion Expenses				(57,578)	(50,518)	(23,673)	(7,097)	(7,097)
Property Taxes		NPT		41,043	32,334	17,056	39,737	24,659
Other Taxes				28,800	22,689	11,968	27,883	17,303
Gain Disposition of Allowances				(1,859)	(1,608)	(810)	(1,897)	(193)
State and Federal Income Taxes				532,175 \$	361,926 \$	158,250 \$	365,060 \$	(444,978)
Specific Assignment of Curtailable Service Rider Credit								
Allocation of Curtailable Service Rider Credits		SCP		26,400 \$	23,067 \$	10,168 \$	29,038 \$	4,940
Adjustments to Operating Expenses:								
Eliminate mismatch in fuel cost recovery				(238,347) \$	(206,595) \$	(104,115) \$	(243,795) \$	(24,816)
Remove ECR expenses				(1,810)	(1,443)	(696)	(1,713)	(156)
Eliminate brokered sales expenses				(184,700)	(161,450)	(81,363)	(190,521)	(19,393)
Eliminate DSM Expenses								
Year end adjustment				(141,450)	(165,932)		(424,256)	(13,589)
Depreciation adjustment								
Adjustment for change in depreciation rate				10,206 \$	8,055 \$	4,281 \$	9,897 \$	6,487
Labor adjustment				4,273 \$	3,325 \$	1,810 \$	4,004 \$	4,242
Medical Expense (See Functional Assignment)								
Adjustment for pension/retir benefit (See Functional Assignment)								
Storm damage adjustment				(860)		(395)		(3,556)
Eliminate advertising expenses (See Functional Assignment)				430	344	166	410	37
Adjustment for amortization of ESM audit expense				2,202	1,874	952	2,233	754
Amortization of rate case expenses								
Remove Amortization of one-utility costs (See Functional Assignment)								
Adjustment for VDT net savings to shareholders								
Adjustment for merger savings				12,344	9,607	5,228	11,588	12,254
Adjustment for MISO schedule 10 expenses				80,880	62,948	34,254	75,796	80,293
Adjustment for effect of accounting change				(11,625)	(9,048)	(4,924)	(10,895)	(11,541)
Adjustment for IT staff reduction				5,610	4,922	2,306	6,064	691
Adjustment to remove Altrom expenses				41,526	32,487	17,268	39,917	26,163
Adjustment for corporate lease expense				(2,565)	(1,997)	(1,087)	(2,547)	(2,404)
Adjustment for sales tax refund				(20,800)	(18,250)	(8,552)	(22,486)	(2,564)
Adjustment for OMI Nox expense								
Adjustment for ice storm				888	709	345	847	77
Adjustment for management audit fee				13,037	11,438	5,360	14,093	1,607
Adjustment for Retirement of Green River Units 1 & 2				(9,598)	(4,411)	(4,411)		(39,675)
VDT Amortization and Surcredit				1,024	872	443	1,039	351
Total Expense Adjustments				(5,092) \$	(2,696) \$	(1,281) \$	(5,309) \$	(871)
				(445,720)	(435,284)	(136,629)	(738,674)	(286)
Total Operating Expenses		TOE		3,986,444 \$	3,209,576 \$	1,699,608 \$	3,553,714 \$	1,057,389
Net Operating Income (Adjusted)				914,249 \$	631,263 \$	284,498 \$	653,634 \$	(629,614)
Net Cost Rate Base				6,738,314 \$	5,192,612 \$	2,812,219 \$	6,367,053 \$	4,518,731
<b>Rate of Return</b>				<b>13.57%</b>	<b>12.16%</b>	<b>10.12%</b>	<b>10.27%</b>	<b>-13.93%</b>

BIP Prod Trans Allocation  
 Corrected Demand Allocators  
 Removes ECR Rate Base  
 Present Revenues Reflect CSR Incr  
 Allocates CSR Credits no SCP

KENTUCKY UTILITIES  
Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	All Electric School AES	Electric Space Heating Rider 33	Water Pumping M	Street Lighting S/L/L	Decorative Street Lighting Dec. St. L/L	Private Outdoor Lighting P/O L/L	Customer Outdoor Lighting C O L/L	Special Contracts						
<b>Operating Expenses</b>																	
Operation and Maintenance Expenses				\$	590,795	\$	602,027	\$	3,408,568	\$	323,214	\$	2,924,595	\$	462,005	\$	13,356,738
Depreciation and Amortization Expenses				\$	93,849	\$	135,562	\$	1,853,401	\$	214,910	\$	932,522	\$	149,201	\$	1,733,976
Regulatory Credits and Accretion Expenses				\$	(9,429)	\$	(11,457)	\$	(18,394)	\$	(1,051)	\$	(28,558)	\$	(4,433)	\$	(251,298)
Property Taxes				\$	8,730	\$	12,521	\$	165,497	\$	19,146	\$	84,062	\$	13,444	\$	164,462
Other Taxes				\$	33,649	\$	8,786	\$	116,130	\$	13,434	\$	58,967	\$	9,434	\$	115,403
Gain Disposition of Allowances				\$	(1,498)	\$	(257)	\$	(601)	\$	(34)	\$	(933)	\$	(145)	\$	(6,918)
State and Federal Income Taxes				\$	172,489	\$	5,722	\$	(358,755)	\$	50,715	\$	814,753	\$	94,631	\$	1,251,832
Specific Assignment of Curtailable Service Rider Credit				\$	38,263	\$	6,563	\$	-	\$	-	\$	-	\$	-	\$	(3,630,403)
Allocation of Curtailable Service Rider Credits				\$	38,263	\$	6,563	\$	-	\$	-	\$	-	\$	-	\$	161,576
<b>Adjustments to Operating Expenses:</b>																	
Eliminate mismatch in fuel cost recovery				\$	(32,967)	\$	(32,629)	\$	(77,281)	\$	(4,417)	\$	(119,863)	\$	(18,611)	\$	(886,821)
Remove ECR expenses				\$	(1,423)	\$	(232)	\$	(1,953)	\$	(281)	\$	(2,260)	\$	(330)	\$	(6,866)
Eliminate brokered sales expenses				\$	(150,209)	\$	(25,763)	\$	(60,394)	\$	(3,452)	\$	(93,686)	\$	(14,544)	\$	(694,595)
Eliminate DSM Expenses				\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Year end adjustment				\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Depreciation adjustment				\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Adjustment for change in depreciation rate				\$	12,164	\$	3,208	\$	43,857	\$	5,085	\$	22,066	\$	3,631	\$	41,032
Labor adjustment				\$	4,860	\$	1,254	\$	19,837	\$	2,244	\$	10,760	\$	1,724	\$	15,859
Medical Expense (See Functional Assignment)				\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Adjustment for pension/post retir benefit (See Functional Assignment)				\$	-	\$	(1,032)	\$	(3,854)	\$	(302)	\$	(4,091)	\$	(639)	\$	(912)
Storm damage adjustment				\$	(2,563)	\$	(552)	\$	(3,854)	\$	(302)	\$	(4,091)	\$	(639)	\$	(912)
Eliminate advertising expenses (See Functional Assignment)				\$	338	\$	62	\$	462	\$	68	\$	594	\$	78	\$	1,412
Adjustment for amortization of ESM audit expense				\$	2,024	\$	387	\$	2,189	\$	208	\$	1,879	\$	297	\$	8,579
Amortization of rate case expenses				\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Remove Amortization of one-utility costs (See Functional Assignment)				\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Adjustment for VDT net savings to shareholders				\$	14,041	\$	3,122	\$	57,308	\$	6,482	\$	31,067	\$	4,991	\$	45,616
Adjustment for merger savings				\$	91,999	\$	20,454	\$	375,496	\$	42,475	\$	203,690	\$	32,637	\$	300,200
Adjustment for MISO schedule 10 expenses				\$	(13,224)	\$	(2,840)	\$	(53,972)	\$	(6,105)	\$	(29,278)	\$	(4,691)	\$	(43,150)
Adjustment for effect of accounting change				\$	5,356	\$	819	\$	1,792	\$	102	\$	2,782	\$	432	\$	24,483
Adjustment for IT staff reduction				\$	49,061	\$	8,857	\$	176,888	\$	20,511	\$	88,999	\$	14,240	\$	165,490
Adjustment to remove Alstom expenses				\$	(2,918)	\$	(753)	\$	(11,911)	\$	(1,347)	\$	(6,461)	\$	(1,035)	\$	(9,522)
Adjustment for corporate lease expense				\$	(19,859)	\$	(3,406)	\$	(6,645)	\$	(380)	\$	(10,317)	\$	(1,802)	\$	(90,781)
Adjustment for sales tax refund				\$	698	\$	120	\$	953	\$	141	\$	1,102	\$	162	\$	2,913
Adjustment for OMU Nox expense				\$	12,447	\$	2,594	\$	4,165	\$	238	\$	6,466	\$	1,004	\$	56,898
Adjustment for ice storm				\$	(28,599)	\$	(6,163)	\$	(43,003)	\$	(3,368)	\$	(45,641)	\$	(7,132)	\$	(10,180)
Adjustment for management audit fee				\$	942	\$	180	\$	1,019	\$	97	\$	874	\$	138	\$	3,992
Adjustment for Retirement of Green River Units 1 & 2				\$	(4,423)	\$	(759)	\$	(1,589)	\$	(90)	\$	(2,434)	\$	(378)	\$	(20,263)
VDT Amortization and Surcredit				\$	(2,682)	\$	(446)	\$	(3,843)	\$	(557)	\$	(4,383)	\$	(830)	\$	(12,760)
Total Expense Adjustments				\$	(224,185)	\$	(31,273)	\$	429,923	\$	64,722	\$	94,866	\$	(1,939)	\$	(1,111,186)
Total Operating Expenses				\$	3,676,265	\$	655,878	\$	720,273	\$	5,595,768	\$	685,056	\$	4,880,294	\$	11,784,204
Net Operating Income (Adjusted)				\$	375,547	\$	28,779	\$	(174,691)	\$	121,956	\$	1,448,234	\$	176,622	\$	2,321,278
Net Cost Rate Base				\$	8,113,397	\$	1,490,422	\$	2,176,766	\$	31,905,511	\$	3,716,038	\$	15,836,075	\$	2,518,660
<b>Rate of Return</b>				<b>4.63%</b>	<b>1.93%</b>	<b>1.18%</b>	<b>-0.55%</b>	<b>3.23%</b>	<b>9.15%</b>	<b>7.01%</b>	<b>8.79%</b>						

BIP Prod Trans Allocation  
Corrected Demand Allocators  
Remove ECR Rate Base  
Present Revenues Reflect CSR Incr  
Allocates CSR Credits on SCP

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

**AN ADJUSTMENT OF THE GAS AND ELECTRIC  
RATES, TERMS, AND CONDITIONS OF  
LOUISVILLE GAS AND ELECTRIC COMPANY**

)  
)  
)  
)

**CASE NO.  
2003-00433**

**AND**

)  
)

**AN ADJUSTMENT OF THE GAS AND ELECTRIC  
RATES, TERMS, AND CONDITIONS OF  
KENTUCKY UTILITIES COMPANY**

)  
)  
)

**CASE NO.  
2003-00434**

**EXHIBIT (SJB-3)**

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate RS	All Electric Residential Rates FERS	General Service		General Service Primary GBP
							Secondary GSS	Secondary GSS	
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue – Actual				\$ 768,801,159	\$ 138,088,905	\$ 147,748,544	\$ 69,484,810	\$ 2,833,889	
Pro-Forma Adjustments:									
Eliminate unbilled revenue			R01 Energy	675,000	122,243	128,125	61,916	2,528	
Adjustment for Mismatch in fuel cost recovery				(35,887,728)	(5,723,277)	(6,590,128)	(2,383,685)	(109,346)	
Adjustment to Reflect Full Year of FAC Roll-in		FACR1		1,417,623	181,543	182,116	86,991	4,709	
Remove ECR revenues		ECRREV		(25,039,978)	(4,562,377)	(4,715,925)	(2,291,842)	(91,531)	
Adjustment to reflect Full Year of ECR Roll-in		ECRR1		17,886,813	3,208,163	3,428,757	1,647,196	66,930	
Remove off-system ECR revenues			PLPPT Energy	(22,778,418)	(138,218)	(191,523)	(71,748)	(3,040)	
Eliminate brokered sales				(4,604,742)	(3,600,306)	(4,145,611)	(1,505,781)	(68,786)	
Eliminate ESM revenues collected		ESMREV		1,630,147	(915,119)	(611,110)	(428,633)	(15,283)	
Eliminate ESM/FAC/ECR from rate refund acct.		DSMREV		(2,942,835)	(1,508,819)	(1,088,804)	(322,733)	(6,105)	
Year end adjustment		YREND		251,167	(417,181)	1,771,704	815,724	(10,745)	
Merger savings		RATESW		(3,005,567)	(464,390)	(480,535)	(235,213)	(9,603)	
Adjustment for rate switching, increased interruptible credit				85,337	15,547	16,258	7,821	304	
VDT Amortization and Surcredit		VDTREV							
Total Pro-Forma Operating Revenue				\$ 683,449,939	\$ 124,591,934	\$ 135,755,911	\$ 65,124,351	\$ 2,606,152	

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Combined Light & Power		Combined Light & Power		Combined Light & Power LPT	Large Committed TOD		High Load Factor	
				LPS	LPP	LCP	LCT		Secondary HLFS	Primary HLPF		
<b>Cost of Service Summary - Pro-Forma</b>												
<b>Operating Revenues</b>												
Total Operating Revenue - Actual				\$ 176,693,980	\$ 39,734,620	\$ 602,907	\$ 74,911,352	\$ 21,247,884	\$ 13,940,078	\$ 26,226,061		
Pro-Forma Adjustments:												
Eliminate unbilled revenue			R01 Energy	\$ 154,859	\$ 34,715	\$ 528	\$ 64,896	\$ 18,376	\$ 12,117	\$ 22,783		
Adjustment for Mismatch in fuel cost recovery				\$ (8,518,255)	\$ (2,083,467)	\$ (31,617)	\$ (4,365,021)	\$ (1,268,707)	\$ (801,803)	\$ (1,517,304)		
Adjustment to Reflect Full Year of FAC Roll-in		FACRI		\$ 365,749	\$ 85,293	\$ 2,524	\$ 194,737	\$ 94,994	\$ 53,661	\$ 62,831		
Remove ECR revenues		ECRREV		\$ (5,734,057)	\$ (1,290,905)	\$ (19,498)	\$ (2,401,012)	\$ (686,721)	\$ (446,872)	\$ (838,688)		
Adjustment to reflect Full Year of ECR Roll-in		ECRRI		\$ 4,133,949	\$ 917,564	\$ 14,085	\$ 1,735,487	\$ 492,058	\$ 316,548	\$ 606,165		
Remove off-system ECR revenues			PLPPT Energy	\$ (156,108)	\$ (37,923)	\$ (604)	\$ (70,555)	\$ (19,498)	\$ (12,090)	\$ (22,844)		
Eliminate brokered sales				\$ (5,358,526)	\$ (1,316,924)	\$ (19,889)	\$ (2,745,877)	\$ (798,098)	\$ (504,385)	\$ (854,481)		
Eliminate ESM revenues collected		ESMREV		\$ (1,152,341)	\$ (284,123)	\$ (3,814)	\$ (474,129)	\$ (137,016)	\$ (89,283)	\$ (160,668)		
Eliminate ESM FAC ECR from rate refund acct.			R01	\$ 373,990	\$ 83,637	\$ 1,271	\$ 156,727	\$ 44,379	\$ 29,263	\$ 55,022		
Eliminate DSM Revenue		DSMREV		\$ (98,441)	\$ (12,123)	\$ (472)	\$ -	\$ -	\$ -	\$ (637,561)		
Year end adjustment		YREND		\$ (597,774)	\$ 117,995	\$ 273,166	\$ (246,535)	\$ (69,609)	\$ (46,031)	\$ (86,551)		
Mergers savings			R01	\$ (588,237)	\$ (131,879)	\$ (2,000)	\$ (64,168)	\$ (120,783)	\$ 1,514	\$ 2,828		
Adjustment for rate switching, increased interruptible credit		RATESW		\$ 19,479	\$ 4,382	\$ 66	\$ 8,140	\$ 2,334	\$ -	\$ -		
VDI Amortization and Surch			VDTREV	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
Total Pro-Forma Operating Revenue				\$ 159,538,209	\$ 35,787,997	\$ 816,653	\$ 66,704,024	\$ 18,797,384	\$ 12,452,617	\$ 22,857,613		

KENTUCKY UTILITIES  
Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	Coal Mining Power		Coal Mining Power Transmission		Large Power Mine Power TOD Primary		Large Power Mine Power TOD Transmission		Combination Off-Peak CWH	
				Primary MPP	MPT	Primary MPP	MPT	Primary LMP	Transmission LMP				
<b>Cost of Service Summary – Pro-Forms</b>													
<b>Operating Revenues</b>													
Total Operating Revenue – Actual				\$	5,657,368	\$	4,549,667	\$	2,216,400	\$	5,433,524	\$	506,788
Pro-Forma Adjustments:													
Eliminate unbilled revenue				\$	4,976	\$	3,978	\$	1,924	\$	4,748	\$	432
Adjustment for mismatch in fuel cost recovery			R01 Energy	\$	(268,036)	\$	(234,296)	\$	(118,074)	\$	(276,483)	\$	(28,144)
Adjustment to Reflect Full Year of FAC Roll-in		FACRI		\$	12,843	\$	13,496	\$	2,865	\$	11,438	\$	1,179
Remove ECR revenues		ECRREV		\$	(182,407)	\$	(145,445)	\$	(70,105)	\$	(172,666)	\$	(15,723)
Adjustment to reflect Full Year of ECR Rollin		ECRRI		\$	132,466	\$	105,333	\$	51,614	\$	127,076	\$	11,770
Remove off-system ECR revenues			PLPPT Energy	\$	(5,481)	\$	(4,328)	\$	(2,496)	\$	(5,692)	\$	(800)
Eliminate brokered sales				\$	(168,612)	\$	(147,387)	\$	(74,276)	\$	(173,926)	\$	(17,704)
Eliminate ESM revenues collected		ESMREV		\$	(33,089)	\$	(25,314)	\$	(11,418)	\$	(28,011)	\$	(2,590)
Eliminate ESM FAC/ECR from rate refund acct.			R01	\$	12,018	\$	9,606	\$	4,648	\$	11,466	\$	1,042
Eliminate DSM Revenue		DSMREV		\$	-	\$	-	\$	-	\$	(703,778)	\$	(22,542)
Year end adjustment		YREND		\$	(234,645)	\$	(275,257)	\$	(7,311)	\$	(18,037)	\$	(1,638)
Merger savings				\$	(18,905)	\$	(15,111)	\$	(7,311)	\$	(18,037)	\$	(1,638)
Adjustment for rate switching, increased interruptible credit		RATESW		\$	619	\$	493	\$	236	\$	579	\$	52
VDT Amortization and Surcredit			VDTEV	\$	(13,506,972)	\$	3,835,436	\$	1,994,007	\$	4,210,238	\$	432,121

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	All Electric School AES	Electric Space Heating Rider 33	Water Pumping M	Street Lighting S/Lt	Decorative Street Lighting Dec St Lt	Private Outdoor Lighting P/O Lt	Customer Outdoor Lighting C O Lt	Special Contracts	
<b>Cost of Service Summary – Pro-Forma</b>												
<b>Operating Revenues</b>												
Total Operating Revenue – Actual				\$ 4,499,169	\$ 776,044	\$ 810,389	\$ 5,650,884	\$ 817,736	\$ 6,601,431	\$ 972,090	\$ 18,776,639	
Pro-Forma Adjustments:												
Eliminate unbilled revenue				3,911	675	717	5,345	790	6,176	907	16,335	
Adjustment for Mismatch in fuel cost recovery				(217,983)	(37,387)	(37,004)	(87,643)	(5,009)	(135,957)	(21,106)	(1,007,984)	
Adjustment to Reflect Full Year of FAC Roll-in				9,719	881	1,457	(1,021)	(74)	(3,573)	(2,582)	45,827	
Remove ECR revenues		FACRI		(143,373)	(23,364)	(26,361)	(196,772)	(29,280)	(227,715)	(33,264)	(891,956)	
Adjustment to reflect Full Year of ECR Roll-in		ECRREV		104,270	17,741	19,017	144,134	21,362	166,721	24,687	493,730	
Remove off-system ECS revenues		ECRRI		(6,197)	(1,063)	(741)	(2,000)	(114)	(2,941)	(467)	(19,961)	
Eliminate brokened sales		PLPPT		(137,125)	(23,519)	(23,278)	(55,133)	(3,151)	(85,526)	(13,277)	(634,093)	
Eliminate ESM revenues collected		ESMREV		(21,999)	1,124	(4,856)	(37,564)	(5,964)	(43,690)	(6,279)	(133,593)	
Eliminate ESM, FAC, ECR from rate refund acct.		R01		9,445	1,630	1,730	12,909	1,908	14,921	2,192	39,449	
Eliminate DSM Revenue		DSMREV		-	-	-	-	-	-	-	-	
Year end adjustment		YREND		-	(19,849)	-	16,889	12,240	71,430	(19,194)	-	
Merger savings		R01		(14,857)	(2,564)	(2,722)	(20,307)	(3,001)	(23,470)	(3,447)	(62,054)	
Adjustment for rate switching, increased interruptible credit		RATESW		491	81	90	667	102	802	115	2,335	
VDI Amortization and Surcredit		VDTREV		-	-	-	-	-	-	-	-	
Total Pro-Forma Operating Revenue				\$ 4,085,470	\$ 690,430	\$ 738,418	\$ 5,430,388	\$ 807,544	\$ 6,336,611	\$ 900,365	\$ 14,046,931	

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate, RS	All Electric Residential Rate, FERS	General Service		General Service Primary GSP
							Secondary GSS	Primary GSP	
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				\$ 548,721,322	\$ 107,522,919	\$ 120,479,725	\$ 46,905,956	\$ 1,655,416	
Depreciation and Amortization Expenses				88,376,624	20,215,410	23,172,879	9,628,793	259,472	
Regulatory Credits and Accrual Expenses				(8,656,053)	(1,540,948)	(2,135,228)	(799,894)	(33,890)	
Property Taxes				8,211,450	1,860,240	2,147,561	888,762	24,467	
Other Taxes				5,761,996	1,305,335	1,506,949	623,647	17,182	
Gain Disposition of Allowances				(246,288)	(39,277)	(45,228)	(16,427)	(750)	
Slate and Federal Income Taxes				26,916,596	(1,673,726)	(4,042,011)	2,599,323	287,430	
Specific Assignment of Curtailable Service Rider Credit				(4,582,475)					
Allocation of Curtailable Service Rider Credits				4,582,475	934,890	771,944	449,452	11,972	
Adjustments to Operating Expenses:									
Eliminate mismatch in fuel cost recovery				(31,644,777)	(5,046,633)	(5,910,987)	(2,110,684)	(96,419)	
Remove EGR expenses				(248,468)	(45,272)	(48,795)	(22,742)	(908)	
Eliminate brokered sales expenses				(24,729,742)	(3,843,832)	(4,341,167)	(1,649,456)	(75,349)	
Eliminate DSM Expenses				(2,946,471)	(1,510,632)	(1,080,910)	(223,001)	(10,756)	
Year and adjustment				151,410	(251,488)	1,065,029	491,740	-	
Depreciation adjustment				2,091,278	478,362	548,346	227,849	6,140	
Adjustment for change in depreciation rate				1,002,076	250,942	251,816	106,754	2,471	
Labor adjustment									
Medical Expense (See Functional Assignment)									
Adjustment for pension/post retir benefit (See Functional Assignment)				(473,014)	(169,017)	(153,325)	(69,375)	(554)	
Storm damage adjustment									
Eliminate advertising expenses (See Functional Assignment)				58,333	10,564	11,159	5,351	218	
Adjustment for amortization of ESM audit expense				352,456	69,064	77,387	30,129	1,063	
Amortization of rate case expenses									
Remove Amortization of one-utility costs (See Functional Assignment)									
Adjustment for VDT net savings to shareholders				2,895,000	724,972	727,498	308,413	7,138	
Adjustment for merger savings				(18,966,825)	(4,750,713)	(4,766,762)	(2,020,807)	(46,767)	
Adjustment for MISD schedule 10 expenses				(843,344)	(150,132)	(168,157)	(290,463)	(6,722)	
Adjustment for effect of accounting change				8,434,618	1,929,346	2,211,607	77,932	3,302	
Adjustment for IT start reduction				(601,682)	(150,674)	(151,198)	(64,099)	(1,483)	
Adjustment to remove Alstom expenses				(3,126,985)	(556,667)	(771,350)	(286,361)	(12,243)	
Adjustment for corporate lease expense				120,391	21,803	23,030	11,043	451	
Adjustment for sales tax refund				1,959,879	348,897	483,452	181,110	7,673	
Adjustment for OCU Nox expense				(5,277,336)	(1,874,536)	(1,710,617)	(774,008)	(6,178)	
Adjustment for ice storm				163,982	32,133	36,005	14,018	495	
Adjustment for management audit fee				(705,035)	(116,752)	(144,138)	(53,008)	(2,350)	
Adjustment for Retirement of Green River Units 1 & 2				(466,280)	(64,947)	(88,636)	(42,731)	(1,661)	
VDT Amortization and Surcredit				(35,504,716)	(5,665,788)	(4,781,363)	(1,194,417)	(114,142)	
<b>Total Expense Adjustments</b>				\$ 633,180,928	\$ 122,919,145	\$ 137,075,228	\$ 59,065,206	\$ 2,107,127	
<b>Total Operating Expenses</b>				\$ 60,269,011	\$ 1,672,768	\$ 1,321,318	\$ 6,039,145	\$ 499,025	
<b>Net Operating Income (Adjusted)</b>				\$ 1,412,033,543	\$ 328,764,003	\$ 371,073,844	\$ 155,533,255	\$ 3,988,815	
<b>Net Cost Rate Base</b>									
<b>Rate of Return</b>				<b>4.27%</b>	<b>0.51%</b>	<b>-0.36%</b>	<b>3.88%</b>	<b>12.51%</b>	

Avg Excess Prod Trans Allocation  
 All other KTUC Corrections Included

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
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Description	Ref	Name	Allocation Vector	Combined Light & Power		Combined Light & Power		Combined Light & Power		Large Commlnd TOD Primary LCIP	Large Commlnd TOD Transmission LCIT	High Load Factor		High Load Factor Primary HILFP
				LPS	LPP	LPT	LCP	LCIP	LCIT			Secondary HILFS	Primary HILFP	
<b>Operating Expenses</b>														
Operation and Maintenance Expenses				114,460,537	26,120,793	391,342	52,102,212	14,624,123	9,449,840	17,751,732				
Depreciation and Amortization Expenses				14,434,387	3,157,715	45,493	5,809,620	1,457,184	1,029,621	1,875,937				
Regulatory Credits and Accretion Expenses				(1,740,376)	(422,786)	(6,730)	(786,596)	(217,355)	(134,792)	(254,680)				
Property Taxes				1,354,595	299,066	4,320	548,746	138,463	97,063	177,219				
Other Taxes				950,523	209,154	3,032	365,057	97,160	68,109	124,355				
Gain Disposition of Allowances				(58,459)	(14,367)	(217)	(23,956)	(8,707)	(5,503)	(10,413)				
State and Federal Income Taxes				13,932,976	3,168,662	93,531	4,904,205	1,705,475	1,028,417	1,890,385				
Specific Assignment of Curtailable Service Rider Credit				(181,381)			(271,654)	(499,037)						
Allocation of Curtailable Service Rider Credits				1,097,059	240,238	4,048	441,260	101,228	78,321	145,724				
<b>Adjustments to Operating Expenses:</b>														
Eliminate mismatch in fuel cost recovery				(7,511,155)	(1,845,959)	(27,879)	(3,848,951)	(1,118,710)	(707,007)	(1,357,916)				
Remove ECR expenses				(56,898)	(12,609)	(193)	(23,825)	(6,834)	(4,435)	(9,322)				
Eliminate brokered sales expenses				(5,869,813)	(1,442,578)	(21,787)	(3,007,876)	(874,249)	(552,511)	(1,045,554)				
Eliminate DSM Expenses				(98,559)	(12,136)	(473)	-	-	-	-				
Year end adjustment				(360,594)	71,010	164,672	-	-	-	-				
Depreciation adjustment				341,564	74,722	1,077	137,474	34,482	24,364	44,891				
Adjustment for change in depreciation rate				174,630	32,087	447	60,482	15,597	11,191	20,309				
Labor adjustment				-	-	-	-	-	-	-				
Medical Expense (See Functional Assignment)				(42,357)	(5,656)	-	(9,718)	-	(2,245)	(3,009)				
Adjustment for pension/post retir benefit (See Functional Assignment)				-	-	-	-	-	-	-				
Storm damage adjustment				13,383	3,000	45	5,608	1,588	1,047	1,969				
Eliminate advertising expenses (See Functional Assignment)				73,521	16,778	251	33,466	9,393	6,070	11,402				
Adjustment for amortization of ESM audit expense				-	-	-	-	-	-	-				
Amortization of rate case expenses				-	-	-	-	-	-	-				
Remove Amortization of one-utility costs (See Functional Assignment)				504,506	92,699	1,291	174,732	45,061	32,332	56,672				
Adjustment for injuries and damages account 925 (See Functional Assignment)				3,305,658	607,386	8,457	1,144,864	295,251	211,847	384,434				
Adjustment for VDT net savings to shareholders				(475,143)	(87,303)	(12,116)	(164,563)	(42,438)	(30,450)	(55,297)				
Adjustment for merger savings				169,582	41,192	656	76,637	21,177	13,133	24,813				
Adjustment for merger amortization expenses				1,377,610	301,371	4,342	554,467	139,073	88,266	178,038				
Adjustment for MISO schedule 10 expenses				(104,654)	(19,266)	(268)	(36,316)	(9,365)	(6,720)	(12,194)				
Adjustment for effect of accounting change				(628,711)	(162,735)	(2,431)	(284,158)	(78,520)	(48,694)	(92,003)				
Adjustment for IT staff reduction				-	-	-	-	-	-	-				
Adjustment to remove Alstom expenses				27,620	6,192	94	11,575	3,278	2,161	4,064				
Adjustment for corporate lease expense				384,051	95,728	1,524	178,089	49,213	30,519	57,664				
Adjustment for sales tax refund				(472,573)	(63,098)	-	(108,425)	4,370	(25,051)	(33,566)				
Adjustment for ODU Nox expense				34,206	7,806	117	15,970	4,370	2,824	5,305				
Adjustment for ice storm				(158,889)	(38,919)	(597)	(78,596)	(22,541)	(14,176)	(26,816)				
Adjustment for management audit fee				(106,432)	(23,944)	(363)	(44,478)	(12,752)	(8,271)	(15,454)				
Adjustment for Retirement of Green River Units 1 & 2				(8,469,436)	(2,354,437)	127,766	(5,213,900)	(1,546,926)	(965,804)	(2,162,086)				
VDT Amortization and Surcredit														
<b>Total Expense Adjustments</b>				134,961,804	30,221,647	662,566	57,888,982	15,851,611	10,645,271	19,538,175				
<b>Total Operating Expenses</b>				24,576,405	5,566,350	154,087	8,615,032	2,945,773	1,807,345	3,319,438				
<b>Net Operating Income (Adjusted)</b>				226,972,096	48,946,869	694,716	90,792,938	22,427,620	16,112,733	28,237,650				
<b>Net Cost Rate Base</b>				10.85%	11.37%	22.18%	9.76%	13.13%	11.22%	11.35%				

Avg Excess Prod Trans Allocation  
 All other KUDC Corrections Included

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
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Description	Ref	Name	Allocation Vector	Coal Mining Power		Large Power Mine		Large Power Mine		Combination Off-Peak CMA
				Primary MPP	Transmission MPT	Power TOD Primary LMPP	Power TOD Transmission LMPT	Power TOD Transmission LMPT		
<b>Operating Expenses</b>										
Operation and Maintenance Expenses				\$ 3,484,867	\$ 2,866,264	\$ 1,550,678	\$ 3,501,953	\$ 1,202,960		
Depreciation and Amortization Expenses				458,769	325,215	208,749	426,370	286,346		
Regulatory Credits and Accretion Expenses				(61,110)	(48,252)	(27,826)	(63,452)	(8,920)		
Property Taxes			NPT	43,292	30,892	19,699	40,508	25,819		
Other Taxes				30,378	21,677	13,823	28,425	18,117		
Gain Disposition of Allowances				(1,839)	(1,608)	(810)	(1,897)	(193)		
State and Federal Income Taxes			TXINCPF	499,613	386,025	119,969	351,568	(461,502)		
Specific Assignment of Curtailable Service Rider Credit										
Allocation of Curtailable Service Rider Credits			SCP1	26,400	23,067	10,168	29,038	4,940		
<b>Adjustments to Operating Expenses:</b>										
Eliminate mismatch in fuel cost recovery			Energy	(236,347)	(206,595)	(104,115)	(243,795)	(24,816)		
Remove ECR expenses			SCRREV	(1,810)	(1,443)	(696)	(1,713)	(166)		
Eliminate broken sales expenses			Energy	(184,700)	(161,450)	(81,363)	(190,521)	(19,393)		
Eliminate DSM Expenses			DSMREV	-	-	-	-	-		
Year end adjustment			YREND	(141,450)	(165,932)	-	(424,256)	(13,589)		
Depreciation adjustment			DET	10,856	7,696	4,940	10,089	6,776		
Adjustment for change in depreciation rate			DET	4,467	3,239	1,967	4,050	4,311		
Labor adjustment			LBT	-	-	-	-	-		
Medical Expense (See Functional Assignment)			SDALL	(860)	-	(395)	-	(3,556)		
Adjustment for pension/post retir benefit (See Functional Assignment)			REVUC	-	-	-	410	37		
Storm damage adjustment			R01	430	344	166	2,249	773		
Eliminate advertising expenses (See Functional Assignment)			OMT	2,238	1,841	996	-	-		
Adjustment for amortization of ESM audit expense			LBT	-	-	-	-	-		
Amortization of rate case expenses			OMT	-	-	-	-	-		
Remove Amortization of one-utility costs (See Functional Assignment)			LBT	12,731	9,359	5,683	11,701	12,464		
Adjustment for VDT net savings to shareholders			LBT	82,418	61,320	37,237	76,667	81,602		
Adjustment for merger savings			LBT	(11,990)	(8,814)	(5,352)	(11,020)	(11,729)		
Adjustment for amortization expenses			PLTRT	5,954	4,701	2,711	6,183	869		
Adjustment for MISO schedule 10 expenses			DET	43,765	31,038	19,923	40,693	27,329		
Adjustment for effect of accounting change			LBT	(2,646)	(1,945)	(1,181)	(2,432)	(2,588)		
Adjustment for IT start reduction			PLPPT	(22,076)	(17,431)	(10,052)	(22,924)	(3,222)		
Adjustment to remove Alstom expenses			LBT	-	-	-	-	-		
Adjustment for corporate lease expense			R01	888	709	343	847	77		
Adjustment for sales tax refund			PLPPT	13,836	10,925	6,300	14,368	2,020		
Adjustment for OMU Nox expense			SDALL	(9,596)	-	(4,411)	-	(39,675)		
Adjustment for ice storm			OMT	1,041	657	463	1,047	359		
Adjustment for management audit fee			OMPPT	(5,171)	(4,331)	(2,302)	(5,345)	(610)		
Adjustment for Retirement of Green River Units 1 & 2			VDTRV	(3,381)	(2,696)	(1,291)	(3,165)	(268)		
VDT Amortization and Surcredit				(440,445)	(438,658)	(130,429)	(736,868)	16,989		
<b>Total Expense Adjustments</b>				\$ 4,039,922	\$ 3,186,621	\$ 1,764,022	\$ 3,575,639	\$ 1,084,553		
Total Operating Expenses			TOE	\$ 859,192	\$ 668,815	\$ 229,986	\$ 634,600	\$ (652,432)		
Net Operating Income (Adjusted)				\$ 7,085,179	\$ 4,970,085	\$ 3,220,039	\$ 6,486,097	\$ 4,897,715		
Net Cost Rate Base										
<b>Rate of Return</b>				<b>12.27%</b>	<b>13.46%</b>	<b>7.44%</b>	<b>9.75%</b>	<b>-13.89%</b>		

A: g Excess Prod Trans Allocation  
 All other KUC Corrections Included

KENTUCKY UTILITIES  
 Cust of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Rat	Name	Allocation Vector	All Electric School AES	Electric Spaces Heating Rider 33	Water Pumping M	Street Lighting STL	Decorative Street Lighting Dec STL	Private Outdoor Lighting POL	Customer Outdoor Lighting COL	Special Contracts
<b>Operating Expenses</b>											
Operation and Maintenance Expenses				3,372,049 \$	628,793 \$	553,535 \$	3,532,608 \$	330,304 \$	3,082,355 \$	486,496 \$	12,863,888 \$
Depreciation and Amortization Expenses				688,624	110,959	114,189	1,879,564	216,405	960,855	153,599	1,541,360
Regulatory Credits and Accrual Expenses				(89,089)	(11,850)	(8,266)	(22,299)	(1,274)	(32,788)	(5,090)	(222,545)
Property Taxes			NPT	56,940	10,271	10,490	167,983	18,288	86,755	13,862	146,158
Other Taxes				39,955	7,207	7,361	117,874	13,534	60,876	9,727	102,580
Gain Disposition of Allowances				(1,496)	(257)	(254)	(601)	(34)	(933)	(145)	(6,918)
State and Federal Income Taxes				44,515	(16,228)	26,438	(418,632)	47,282	740,480	83,101	1,617,497
Specific Assignment of Curtable Service Rider Credit											(3,630,403)
Allocation of Curtable Service Rider Credits			SCP1	38,263	6,563	6,225					161,576
<b>Adjustments to Operating Expenses:</b>											
Eliminate mismatch in fuel cost recovery				(192,211)	(32,967)	(32,629)	(77,281)	(4,417)	(119,863)	(18,611)	(888,821)
Remove ECR expenses				(1,423)	(232)	(262)	(1,953)	(291)	(2,260)	(330)	(6,566)
Eliminate brokered sales expenses				(150,208)	(25,763)	(25,498)	(60,394)	(3,452)	(93,666)	(14,544)	(694,595)
Eliminate DSM Expenses											
Year end adjustment							10,181	7,379	43,060	(11,571)	
Depreciation adjustment						2,702	44,477	5,121	22,737	3,635	36,474
Adjustment for change in depreciation rate				14,402	2,605	1,133	19,985	2,252	10,921	1,749	14,768
Labor adjustment				5,386	1,172						
Medical Expense (See Functional Assignment)											
Adjustment for pension/post retir benefit (See Functional Assignment)				(2,563)	(552)	(1,032)	(3,854)	(302)	(4,091)	(639)	(912)
Storm damage adjustment											
Eliminate advertising expenses (See Functional Assignment)				338	58	62	462	68	534	78	1,412
Adjustment for amortization of ESM audit expense				2,166	404	356	2,269	212	1,980	312	8,134
Amortization of rate case expenses											
Remove Amortization of one-utility costs (See Functional Assignment)											
Adjustment for injuries and damages account 925 (See Functional Assignment)				15,589	3,387	3,274	57,736	6,507	31,561	5,053	42,664
Adjustment for VOT net savings to stakeholders				102,141	22,183	21,450	378,302	42,635	206,728	33,109	279,645
Adjustment for merger savings				(14,681)	(3,190)	(3,083)	(54,376)	(6,128)	(28,714)	(4,799)	(40,181)
Adjustment for MISO schedule 10 expenses				6,731	1,155	805	2,173	124	3,194	496	21,682
Adjustment for effect of accounting change				58,087	10,505	10,898	179,385	20,654	91,703	14,659	147,107
Adjustment for IT staff reduction				(3,240)	(704)	(680)	(12,000)	(1,352)	(6,557)	(1,050)	(8,967)
Adjustment to remove Alstom expenses				(24,956)	(4,281)	(2,986)	(8,056)	(460)	(11,844)	(1,839)	(80,394)
Adjustment for corporate lease expense											
Adjustment for sales tax refund				698	120	128	953	141	1,102	162	2,813
Adjustment for ODU Nox expense				15,643	2,683	1,872	5,049	269	7,424	1,152	50,388
Adjustment for ice storm				(28,599)	(6,163)	(11,514)	(43,003)	(3,368)	(45,641)	(7,132)	(10,180)
Adjustment for management audit fee				1,008	188	165	1,096	98	921	145	3,785
Adjustment for Retirement of Green River Units 1 & 2				(4,726)	(811)	(709)	(1,753)	(100)	(3,671)	(415)	(19,249)
VDT Amortization and Surcredit				(2,682)	(445)	(490)	(3,643)	(657)	(4,383)	(630)	(12,760)
Total Expense Adjustments				(203,096)	(42,604)	(36,033)	435,715	65,053	101,724	(968)	(1,153,955)
Total Operating Expenses				3,886,664	691,965	673,678	5,692,011	690,556	4,998,723	740,583	11,219,189
Net Operating Income (Adjusted)				198,807	(1,535)	64,740	(261,623)	116,988	1,339,887	159,803	2,827,732
Net Cost Rate Base				9,498,702	1,728,194	1,863,467	32,288,016	3,737,956	16,251,399	2,583,135	23,576,990
<b>Rate of Return</b>				<b>2.09%</b>	<b>-0.09%</b>	<b>3.47%</b>	<b>-0.81%</b>	<b>3.13%</b>	<b>8.24%</b>	<b>6.19%</b>	<b>11.99%</b>

Avg Excess Prod Trans-Allocation  
 All other KUUC Corrections Included

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

**AN ADJUSTMENT OF THE GAS AND ELECTRIC  
RATES, TERMS, AND CONDITIONS OF  
LOUISVILLE GAS AND ELECTRIC COMPANY**

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)  
)  
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**CASE NO.  
2003-00433**

**AND**

)  
)

**AN ADJUSTMENT OF THE GAS AND ELECTRIC  
RATES, TERMS, AND CONDITIONS OF  
KENTUCKY UTILITIES COMPANY**

)  
)  
)

**CASE NO.  
2003-00434**

**EXHIBIT (SJB-4)**

KENTUCKY UTILITIES  
Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate RS	All Electric Residential Rate FERS	General Service Secondary GSS	General Service Primary GSP
<b>Cost of Service Summary – Pro-Forma</b>								
<b>Operating Revenues</b>								
Total Operating Revenue – Actual				\$ 768,801,158	\$ 138,042,992	\$ 148,047,263	\$ 69,229,545	\$ 2,810,354
<b>Pro-Forma Adjustments:</b>								
Eliminate unbilled revenue				675,000	122,243	129,125	61,916	2,528
Adjustment for Mismatch in fuel cost recovery				(35,887,728)	(5,723,277)	(6,590,128)	(2,393,685)	(109,346)
Adjustment to Reflect Full Year of FAC Roll-in		FACRI		1,417,623	181,543	182,116	96,991	4,709
Remove ECR revenues		ECRREV		(25,039,979)	(4,562,377)	(4,715,925)	(2,291,842)	(91,531)
Adjustment to reflect Full Year of ECR Roll-in		ECRRI		17,986,813	3,206,163	3,425,757	1,647,186	66,930
Remove off-system ECR revenues				(776,418)	(136,190)	(202,354)	(62,130)	(2,166)
Eliminate brokered sales		ESMREV		(22,575,669)	(3,600,306)	(4,145,611)	(1,505,781)	(68,786)
Eliminate ESM revenues collected				(4,604,742)	(915,119)	(611,110)	(428,633)	(15,263)
Eliminate ESM FAC ECR from rate refund acct		DSMREV		1,630,147	295,220	311,841	149,529	6,705
Eliminate DSM Revenue		YREND		(2,942,835)	(1,508,819)	(1,089,604)	(222,733)	(10,743)
Year end adjustment				251,167	(417,181)	1,771,704	815,724	-
Merger savings		RATESIW		(2,564,269)	(464,390)	(490,535)	(235,213)	(9,603)
Adjustment for rate switching, increased interruptible credit				85,337	15,547	16,258	7,821	304
VDI Amortization and Surcredit				(3,005,567)				
Total Pro-Forma Operating Revenue				\$ 663,448,639	\$ 124,538,048	\$ 136,041,798	\$ 64,868,705	\$ 2,583,471

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Description	Ref	Name	Allocation Vector	Combined Light & Power		Combined Light & Power		Large Comm'd TOD Primary LCIP	Large Comm'd TOD Transmission LCIT	High Load Factor		
				LPS	LPP	LPT	HLFS			HLFP		
<b>Cost of Service Summary -- Pro-Forma</b>												
<b>Operating Revenues</b>												
Total Operating Revenue -- Actual				\$ 176,892,840	\$ 39,702,482	\$ 601,680	\$ 74,869,722	\$ 21,186,666	\$ 13,936,369	\$ 26,236,029		
Pro-Forma Adjustments:												
Eliminate unbilled revenue			R01	\$ 154,859	\$ 34,715	\$ 526	\$ 64,896	\$ 18,376	\$ 12,117	\$ 22,783		
Adjustment for Mismatch in fuel cost recovery			Energy	\$ (8,518,255)	\$ (2,093,467)	\$ (31,617)	\$ (4,365,021)	\$ (1,268,707)	\$ (801,803)	\$ (1,517,304)		
Adjustment to Reflect Full Year of FAC Roll-in			FACRI	\$ 365,749	\$ 85,263	\$ 2,524	\$ 194,737	\$ 94,994	\$ 53,661	\$ 62,851		
Remove ECR revenues			ECRREV	\$ (5,734,057)	\$ (1,290,905)	\$ (19,438)	\$ (2,401,012)	\$ (688,721)	\$ (446,972)	\$ (838,688)		
Adjustment to reflect Full Year of ECR Roll-in			ECRRI	\$ 4,133,940	\$ 917,554	\$ 14,085	\$ 1,735,487	\$ 492,058	\$ 316,548	\$ 606,165		
Remove off-system ECR revenues			PLPPT	\$ (163,316)	\$ (36,758)	\$ (559)	\$ (69,046)	\$ (17,276)	\$ (11,956)	\$ (23,205)		
Eliminate brokered sales			Energy	\$ (5,356,526)	\$ (1,316,924)	\$ (19,869)	\$ (2,745,877)	\$ (798,698)	\$ (504,385)	\$ (954,481)		
Eliminate ESM revenues collected			ESMREV	\$ (1,152,341)	\$ (264,123)	\$ (3,814)	\$ (474,129)	\$ (137,016)	\$ (89,283)	\$ (160,668)		
Eliminate ESM FAC/ECR from rate refund acct			R01	\$ 373,890	\$ 83,837	\$ 1,271	\$ 156,727	\$ 44,319	\$ 29,263	\$ 35,022		
Eliminate DSM Revenue			DSMREV	\$ (98,441)	\$ (1,123)	\$ (472)	\$ -	\$ -	\$ -	\$ -		
Year end adjustment			YREND	\$ (597,774)	\$ 117,795	\$ 273,166	\$ (246,535)	\$ (69,809)	\$ (46,031)	\$ (86,551)		
Merger savings			R01	\$ (588,297)	\$ (131,879)	\$ (2,000)	\$ (64,186)	\$ (120,793)	\$ -	\$ -		
Adjustment for rate switching, increased interruptible credit			RATESW	\$ 19,479	\$ 4,382	\$ 66	\$ 8,140	\$ 2,334	\$ 1,514	\$ 2,828		
VDT Amortization and Surcredit			VDTREV	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		
Total Pro-Forma Operating Revenue				\$ 159,729,858	\$ 35,757,024	\$ 815,470	\$ 66,663,904	\$ 18,738,386	\$ 12,449,042	\$ 22,867,219		

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Description	Ref	Name	Allocation Vector	Coal Mining Power		Coal Mining Power Transmission		Large Power Mine Power TOD		Large Power Mine Power TOD Transmission		Combination Off-Peak CWH	
				Primary MPP	MPT	Primary MPP	MPT	Primary LMP	LMP	Primary LMP	LMP		
<b>Cost of Service Summary – Pro-Forma</b>													
<b>Operating Revenues</b>													
Total Operating Revenue -- Actual				\$	5,638,015	\$	4,546,102	\$	2,199,244	\$	5,422,766	\$	503,555
Pro-Forma Adjustments:				\$	4,976	\$	3,978	\$	1,824	\$	4,748	\$	432
Eliminate unbilled revenue			R01 Energy	\$	(268,035)	\$	(234,296)	\$	(118,074)	\$	(276,463)	\$	(28,144)
Adjustment for mismatch in fuel cost recovery			FACRI	\$	12,843	\$	13,496	\$	2,865	\$	11,438	\$	1,179
Adjustment to reflect Full Year of FAC Roll-in			ECRREV	\$	(182,407)	\$	(145,445)	\$	(70,105)	\$	(172,866)	\$	(15,723)
Remove ECR revenues			ECRRI	\$	132,466	\$	105,333	\$	51,614	\$	127,076	\$	11,770
Adjustment to reflect Full Year of ECR Roll-in			PLPPT	\$	(4,780)	\$	(4,199)	\$	(1,874)	\$	(5,302)	\$	(683)
Remove off-system ECR revenues			Energy	\$	(168,512)	\$	(147,387)	\$	(74,276)	\$	(173,926)	\$	(17,704)
Eliminate brokened sales			ESMREV	\$	(33,089)	\$	(25,314)	\$	(11,418)	\$	(26,011)	\$	(2,690)
Eliminate ESM revenues collected			R01	\$	12,018	\$	9,606	\$	4,648	\$	11,466	\$	1,042
Eliminate ESM/FAC ECR from rate refund acct.			DSMREV	\$	(234,645)	\$	(275,257)	\$	(7,311)	\$	(703,778)	\$	(22,542)
Eliminate DSM Revenue			YREND	\$	(16,905)	\$	(15,111)	\$	(7,311)	\$	(18,037)	\$	(1,639)
Year end adjustment			RATESW	\$	619	\$	493	\$	236	\$	579	\$	52
Merger savings			VDTREV	\$	(13,504,945)	\$	3,832,000	\$	1,977,473	\$	4,199,870	\$	429,095
Adjustment for rate switching, increased interruptible credit													
VDT Amortization and Surcredit													
Total Pro-Forma Operating Revenue				\$	4,890,463	\$	3,832,000	\$	1,977,473	\$	4,199,870	\$	429,095

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Description	Ref	Name	Allocation Vector	All Electric School AES	Electric Space Heating Rider	Water Pumping M	Street Lighting STL	Decorative Street Lighting Dec St.Lt.	Private Outdoor Lighting PO.Lt.	Customer Outdoor Lighting C.O.Lt.	Special Contracts	
<b>Cost of Service Summary – Pro-Forma</b>												
<b>Operating Revenues</b>												
Total Operating Revenue – Actual				\$ 4,474,128	\$ 771,748	\$ 821,029	\$ 5,630,511	\$ 816,571	\$ 6,574,367	\$ 967,888	\$ 18,879,292	
Pro-Forma Adjustments:												
Eliminate unbilled revenue				3,911	675	717	5,345	790	6,178	907	16,335	
Adjustment for mismatch in fuel cost recovery				(217,983)	(37,387)	(37,004)	(87,643)	(5,009)	(135,957)	(21,106)	(1,007,994)	
Adjustment to Reflect Full Year of FAC Roll-in				9,719	881	1,457	(1,021)	(74)	(3,573)	(2,582)	45,827	
Remove ECR revenues		FACRI		(143,373)	(23,384)	(26,361)	(196,772)	(29,260)	(227,715)	(33,264)	(691,956)	
Adjustment to reflect Full Year of ECR Roll-in		ECRRI		104,270	17,741	19,017	144,134	21,362	166,721	24,687	493,730	
Remove off-system ECR revenues		PLPPT		(5,289)	(907)	(1,127)	(1,261)	(72)	(1,900)	(304)	(23,684)	
Eliminate brokered sales		Energy		(137,125)	(23,519)	(23,278)	(55,133)	(3,151)	(85,526)	(13,277)	(634,099)	
Eliminate ESM revenues collected		ESMREV		(21,999)	1,124	(4,856)	(37,564)	(5,964)	(43,690)	(6,279)	(133,093)	
Eliminate ESM FAC ECR from rate refund acct.		R01		9,445	1,630	1,730	12,909	1,908	14,921	2,192	39,449	
Eliminate DSM Revenue		DSMREV		-	-	-	-	-	-	-	-	
Year end adjustment		YREND		-	-	-	-	-	-	-	-	
Merger savings		RATESW		(14,857)	(2,564)	(2,722)	(20,307)	(3,001)	(23,470)	(3,447)	(62,054)	
Adjustment for rate switching, increased interruptible credit				491	81	90	667	102	802	115	2,335	
VDT Amortization and Surcredit		VDTREX		-	-	-	-	-	-	-	-	
Total Pro-Forma Operating Revenue				\$ 4,061,337	\$ 686,291	\$ 748,672	\$ 5,410,754	\$ 806,422	\$ 6,312,528	\$ 896,336	\$ 14,145,862	

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Description	Ref	Name	Allocation Vector	Total System	Residential Rate RS	All Electric Residential Rate FERS	General Service Secondary GSS	General Service Primary GSP
<b>Operating Expenses</b>								
Operation and Maintenance Expenses				\$ 548,721,322	\$ 106,362,519	\$ 119,256,735	\$ 44,251,501	\$ 1,484,596
Depreciation and Amortization Expenses				88,376,624	20,064,000	23,981,781	8,910,473	195,742
Regulatory Credits and Accretion Expenses				(8,656,053)	(1,518,346)	(2,255,980)	(692,665)	(24,376)
Property Taxes				8,211,460	1,845,852	2,224,426	820,593	18,401
Other Taxes				5,761,966	(38,277)	1,980,887	575,749	12,912
Gain Disposition of Allowances				(246,288)	(45,226)	(16,427)	(750)	(750)
State and Federal Income Taxes				26,916,596	(1,152,038)	(3,310,688)	3,953,435	382,134
Specific Assignment of Curtailable Service Rider Credit				(4,582,475)		771,944		
Allocation of Curtailable Service Rider Credits				4,582,475	934,980		448,452	11,972
<b>Adjustments to Operating Expenses:</b>								
Eliminate mismatch in fuel cost recovery				(31,644,777)	(5,046,623)	(5,810,987)	(2,110,684)	(96,419)
Remove ECR expenses				(248,468)	(45,272)	(46,795)	(22,742)	(908)
Eliminate brokered sales expenses				(24,729,742)	(3,943,832)	(4,541,167)	(1,648,456)	(75,349)
Eliminate DSM Expenses				(2,946,471)	(1,510,632)	(1,090,913)	(233,001)	(10,756)
Year end adjustment				151,410	(251,466)	1,068,028	481,740	
Depreciation adjustment				2,091,278	474,770	567,487	210,851	4,632
Adjustment for change in depreciation rate				1,002,076	250,084	258,389	102,685	2,110
Labor adjustment								
Medical Expense (See Functional Assignment)								
Adjustment for pension/post retir benefit (See Functional Assignment)				(473,014)	(168,017)	(153,325)	(69,375)	(554)
Storm damage adjustment								
Eliminate advertising expenses (See Functional Assignment)								
Adjustment for amortization of ESM audit expense				58,333	10,564	11,159	5,351	218
Amortization of rate case expenses				352,456	68,319	76,601	28,424	954
Remove Amortization of one-utility costs (See Functional Assignment)								
Adjustment for VDT net savings to shareholders				2,895,000	722,484	740,735	296,657	6,095
Adjustment for merger savings				18,968,825	4,733,976	4,853,506	1,943,777	39,933
Adjustment for amortization expenses				(2,726,510)	(680,445)	(697,625)	(279,391)	(5,740)
Adjustment for MISD schedule 10 expenses				843,344	147,930	219,796	67,485	2,375
Adjustment for effect of accounting change				8,434,618	1,914,897	2,288,809	850,411	18,892
Adjustment for IT staff reduction				(601,682)	(150,159)	(153,951)	(61,656)	(1,267)
Adjustment to remove Alstom expenses				(3,126,895)	(548,502)	(814,972)	(250,225)	(8,906)
Adjustment for corporate lease expense								
Adjustment for sales tax refund				120,391	21,803	23,000	11,043	451
Adjustment for OMI Nox expense				1,959,879	543,780	510,793	156,831	5,519
Adjustment for ice storm				(5,277,336)	(1,874,536)	(1,710,617)	(774,006)	(6,176)
Adjustment for management audit fee				163,982	31,786	35,639	13,224	444
Adjustment for Retirement of Green River Units 1 & 2				(795,035)	(114,982)	(141,764)	(49,153)	(2,111)
VDT Amortization and Sucredit				(466,280)	(84,947)	(88,836)	(42,731)	(1,661)
Total Expense Adjustments				(35,904,718)	(5,699,021)	(4,599,987)	(1,353,943)	(128,337)
Total Operating Expenses		TOE		\$ 633,180,928	\$ 122,093,908	\$ 136,984,925	\$ 56,898,087	\$ 1,952,294
Net Operating Income (Adjusted)				\$ 60,269,011	\$ 2,444,140	\$ (943,125)	\$ 7,970,617	\$ 631,177
Net Cost Rate Base				\$ 1,412,033,543	\$ 326,544,534	\$ 382,931,422	\$ 145,003,625	\$ 3,054,618
<b>Rate of Return</b>				<b>4.27%</b>	<b>0.75%</b>	<b>-0.25%</b>	<b>5.50%</b>	<b>20.66%</b>

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Description	Ref	Name	Allocation Vector	Combined Light & Power		Combined Light & Power		Combined Light & Power		Large Committed		Large Committed		High Load Factor		High Load Factor		
				LPS	LPP	LPT	LCP	LCT	LCIP	TOD Primary	TOD Transmission	Secondary HLPs	Primary HLPs	Secondary HLPs	Primary HLPs			
<b>Operating Expenses</b>																		
Operation and Maintenance Expenses				\$ 117,330,078	\$ 26,376,329	\$ 389,251	\$ 53,278,885	\$ 14,752,145	\$ 1,291,409	\$ 9,739,162	\$ 18,395,937							
Depreciation and Amortization Expenses				14,872,868	3,070,687	42,170	1,291,409	1,291,409	1,291,409	1,019,576	1,902,929							
Regulatory Credits and Accretion Expenses				(1,820,763)	(409,805)	(6,234)	(768,768)	(192,809)	(192,809)	(133,293)	(258,709)							
Property Taxes				1,405,766	289,796	4,005	358,034	123,710	123,710	96,108	179,784							
Other Taxes				986,430	203,351	2,810	377,940	86,106	86,106	67,439	126,155							
Gain Disposition of Allowances				(58,459)	(14,367)	(217)	(29,956)	(5,707)	(5,707)	(6,503)	(10,413)							
State and Federal Income Taxes				12,611,316	3,105,793	95,789	4,490,338	1,728,776	1,728,776	916,998	1,625,425							
Specific Assignment of Curtailable Service Rider Credit				(181,381)	(181,381)	-	(271,654)	(489,037)	(489,037)	-	-							
Allocation of Curtailable Service Rider Credits				1,097,059	240,238	4,049	441,260	101,228	101,228	78,321	145,724							
<b>Adjustments to Operating Expenses:</b>																		
Eliminate mismatch in fuel cost recovery				(7,511,155)	(1,845,959)	(27,879)	(3,848,951)	(1,118,710)	(1,118,710)	(707,007)	(1,337,916)							
Remove ECR expenses				(56,898)	(12,809)	(193)	(23,825)	(6,834)	(6,834)	(4,435)	(8,322)							
Eliminate brokered sales expenses				(5,869,813)	(1,442,578)	(21,787)	(3,007,876)	(874,249)	(874,249)	(552,511)	(1,045,554)							
Eliminate DSM Expenses				(98,595)	(12,138)	(473)	-	-	-	-	-							
Year end adjustment				(360,354)	(71,010)	164,672	-	-	-	-	(324,056)							
Depreciation adjustment				354,307	72,662	998	134,807	30,559	30,559	24,126	45,029							
Adjustment for change in depreciation rate				177,680	31,594	428	59,843	14,858	14,858	11,134	20,462							
Labor adjustment				-	-	-	-	-	-	-	-							
Medical Expense (See Functional Assignment)				(42,357)	(6,656)	-	(9,718)	-	-	(2,245)	(3,009)							
Adjustment for pension/post retir benefit (See Functional Assignment)				-	-	-	-	-	-	-	-							
Storm damage adjustment				13,383	3,000	46	5,608	1,988	1,988	1,047	1,969							
Eliminate advertising expenses (See Functional Assignment)				75,300	16,942	250	34,222	9,476	9,476	6,256	11,816							
Adjustment for amortization of ESM audit expense				-	-	-	-	-	-	-	-							
Amortization of rate case expenses				-	-	-	-	-	-	-	-							
Remove Amortization of one-utility costs (See Functional Assignment)				513,319	91,274	1,236	172,887	42,348	42,348	32,168	59,114							
Adjustment for injuries and damages account 925 (See Functional Assignment)				3,363,406	598,053	8,101	1,132,806	277,474	277,474	210,770	387,328							
Adjustment for VDI net savings to shareholders				(483,444)	(85,962)	(1,164)	(162,825)	(39,883)	(39,883)	(30,295)	(55,673)							
Adjustment for merger savings				177,584	39,927	607	74,987	18,766	18,766	12,887	25,206							
Adjustment for MISO schedule 10 expenses				1,429,005	293,065	4,025	543,708	123,261	123,261	97,308	181,614							
Adjustment for effect of accounting change				(106,688)	(18,670)	(257)	(35,932)	(8,801)	(8,801)	(6,686)	(12,286)							
Adjustment for IT staff reduction				(657,750)	(146,042)	(2,232)	(278,076)	(69,580)	(69,580)	(48,152)	(93,458)							
Adjustment to remove Alstom expenses				-	-	-	-	-	-	-	-							
Adjustment for corporate lease expense				27,620	6,192	94	11,575	3,278	3,278	2,161	4,054							
Adjustment for sales tax refund				412,252	92,787	1,411	174,289	43,610	43,610	30,180	58,576							
Adjustment for OMI Nox expense				(472,573)	(63,098)	-	(106,425)	-	-	(25,051)	(33,566)							
Adjustment for ice storm				35,033	7,882	116	15,922	4,409	4,409	2,910	5,486							
Adjustment for management audit fee				(163,032)	(38,372)	(595)	(80,530)	(22,832)	(22,832)	(14,643)	(27,629)							
Adjustment for Retirement of Green River Units 1 & 2				(106,432)	(23,944)	(363)	(44,478)	(12,752)	(12,752)	(8,271)	(15,454)							
VDI Amortization and Surrexit				(9,350,353)	(2,374,142)	127,021	(5,239,976)	(1,564,226)	(1,564,226)	(968,248)	(2,156,448)							
Total Expense Adjustments				\$ 137,073,963	\$ 30,306,501	\$ 658,645	\$ 56,511,391	\$ 15,795,796	\$ 15,795,796	\$ 10,812,561	\$ 19,950,386							
Total Operating Expenses				\$ 22,655,896	\$ 5,450,523	\$ 158,826	\$ 8,152,513	\$ 2,942,590	\$ 2,942,590	\$ 1,636,481	\$ 2,916,834							
Net Operating Income (Adjusted)				\$ 234,865,924	\$ 47,871,184	\$ 646,017	\$ 88,640,445	\$ 19,997,574	\$ 19,997,574	\$ 15,965,493	\$ 29,633,308							
Net Cost Rate Base																		
<b>Rate of Return</b>				<b>9.55%</b>	<b>11.43%</b>	<b>24.28%</b>	<b>9.20%</b>	<b>14.71%</b>	<b>10.25%</b>	<b>9.84%</b>								

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Description	Ref	Name	Allocation Vector	Coal Mining Power Primary MPP	Coal Mining Power Transmission MPT	Large Power Mine Power TOD Primary LPPP	Large Power Mine Power TOD Transmission LMPT	Combination Off-Peak CWH
<b>Operating Expenses</b>								
Operation and Maintenance Expenses				\$ 3,395,813	\$ 2,990,098	\$ 1,458,586	\$ 3,459,123	\$ 1,173,678
Depreciation and Amortization Expenses				406,362	315,599	162,290	397,238	277,591
Regulatory Credits and Accretion Expenses				(53,287)	(46,811)	(20,287)	(59,109)	(7,613)
Property Taxes			NPT	38,312	28,974	15,285	37,748	24,987
Other Taxes				26,883	21,033	10,725	26,482	17,553
Gain Disposition of Allowances				(1,839)	(1,608)	(810)	(1,897)	(193)
State and Federal Income Taxes				557,274	382,826	176,255	380,997	(446,205)
Specific Assignment of Curtailable Service Rider Credit								
Allocation of Curtailable Service Rider Credits			SCP	\$ 26,400	\$ 23,067	\$ 10,168	\$ 29,038	\$ 4,940
Adjustments to Operating Expenses:								
Eliminate mismatch in fuel cost recovery				(236,347)	(206,595)	(104,115)	(243,795)	(24,816)
Remove ECR expenses				(1,810)	(1,443)	(696)	(1,713)	(156)
Eliminate brokered sales expenses				(184,700)	(161,450)	(81,363)	(190,521)	(19,393)
Eliminate DSM Expenses				(141,450)	(165,932)	-	(424,256)	(13,589)
Year end adjustment				-	-	-	-	-
Depreciation adjustment				9,616	7,467	3,840	9,400	6,569
Adjustment for change in depreciation rate				4,110	3,185	1,704	3,685	4,261
Labor adjustment				-	-	-	-	-
Medical Expense (See Functional Assignment)				-	-	-	-	-
Adjustment for pension/post retir benefit (See Functional Assignment)				(860)	-	(395)	-	(3,556)
Storm damage adjustment				-	-	-	-	-
Eliminate advertising expenses (See Functional Assignment)				430	344	166	410	37
Adjustment for amortization of ESM audit expense				2,181	1,656	937	2,222	754
Amortization of rate case expenses				-	-	-	-	-
Remove Amortization of one-utility costs (See Functional Assignment)				-	-	-	-	-
Adjustment for injuries and damages account 925 (See Functional Assignment)				11,673	9,201	4,923	11,224	12,311
Adjustment for VDT net savings to shareholders				77,798	60,284	32,255	73,543	80,664
Adjustment for merger savings				(11,182)	(8,666)	(4,636)	(10,571)	(11,594)
Adjustment for MISO schedule 10 expenses				5,182	4,565	2,035	5,759	742
Adjustment for effect of accounting change				38,783	30,117	15,489	37,912	26,493
Adjustment for IT staff reduction				(2,468)	(1,912)	(1,023)	(2,333)	(2,559)
Adjustment to remove Alatom expenses				(19,250)	(16,910)	(7,547)	(21,353)	(2,750)
Adjustment for corporate lease expense				-	-	-	-	-
Adjustment for sales tax refund				888	709	343	847	77
Adjustment for OMI Nox expense				12,065	10,599	4,730	13,393	1,724
Adjustment for ice storm				(9,598)	-	(4,411)	-	(39,675)
Adjustment for management audit fee				1,015	864	436	1,034	351
Adjustment for Retirement of Green River Units 1 & 2				(5,056)	(4,424)	(2,180)	(5,292)	(568)
VDT Amortization and Surcredit				(3,391)	(2,696)	(1,291)	(3,165)	(286)
Total Expense Adjustments				(462,152)	(440,842)	(140,798)	(743,380)	16,039
Total Operating Expenses		TOE		\$ 3,943,765	\$ 3,173,297	\$ 1,670,809	\$ 3,526,232	\$ 1,059,758
Net Operating Income (Adjusted)				\$ 946,698	\$ 658,703	\$ 308,664	\$ 673,639	\$ (630,752)
Net Cost Rate Base				\$ 6,316,969	\$ 4,828,652	\$ 2,539,011	\$ 6,059,060	\$ 4,569,377
Rate of Return				14.99%	13.64%	12.08%	11.12%	13.80%

KENTUCKY UTILITIES  
Cost of Service Study  
Class Allocation  
12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	All Electric School AES	Electric Space Heating Rider 33	Water Pumping M	Street Lighting SLT	Decorative Street Lighting Dec SLT	Private Outdoor Lighting PO.LT	Customer Outdoor Lighting C.O.LT	Special Contracts
<b>Operating Expenses</b>											
Operation and Maintenance Expenses				\$ 3,145,245	\$ 588,892	\$ 616,278	\$ 3,413,013	\$ 323,469	\$ 2,931,658	\$ 463,102	\$ 13,344,427
Depreciation and Amortization Expenses				540,813	98,439	143,003	1,824,395	213,252	887,566	142,222	1,819,340
Regulatory Credits and Accretion Expenses				(58,967)	(10,114)	(12,568)	(14,064)	(804)	(21,847)	(3,392)	(264,040)
Property Taxes			NPT	50,466	13,228	162,741	18,988	18,988	79,790	12,781	172,574
Other Taxes				35,433	6,432	9,282	114,196	13,324	55,989	8,968	121,095
Gain Disposition of Allowances				(1,486)	(257)	(254)	(601)	(34)	(933)	(145)	(6,918)
State and Federal Income Taxes				162,996	4,063	(10,663)	(347,963)	51,332	831,402	97,215	1,229,785
Specific Assignment of Curtailable Service Rider Credit											(3,630,403)
Allocation of Curtailable Service Rider Credits			SCP	38,263	6,563	6,225					161,576
<b>Adjustments to Operating Expenses:</b>											
Eliminate mismatch in fuel cost recovery				(192,211)	(32,967)	(32,629)	(77,281)	(4,417)	(119,863)	(18,611)	(688,821)
Remove ECR expenses				(1,423)	(232)	(262)	(1,953)	(291)	(2,260)	(330)	(6,866)
Eliminate brokered sales expenses				(150,209)	(25,763)	(25,499)	(60,394)	(3,452)	(93,666)	(14,544)	(694,595)
Eliminate DSM Expenses											
Year end adjustment					(11,965)		10,181	7,379	43,060	(11,571)	
Depreciation adjustment											
Adjustment for change in depreciation rate				12,797	2,329	3,364	43,171	5,046	21,003	3,365	43,051
Labor adjustment				5,012	1,107	1,296	19,672	2,234	10,506	1,885	16,342
Medical Expense (See Functional Assignment)											
Adjustment for pension/retir benefit (See Functional Assignment)				(2,563)	(552)	(1,032)	(3,854)	(302)	(4,091)	(639)	(912)
Storm damage adjustment											
Eliminate advertising expenses (See Functional Assignment)				338	56	62	462	68	534	78	1,412
Adjustment for amortization of ESM audit expense				2,020	379	396	2,192	208	1,883	297	6,571
Amortization of rate case expenses											
Remove Amortization of one-utility costs (See Functional Assignment)											
Adjustment for injuries and damages account 925 (See Functional Assignment)				14,479	3,197	3,745	56,833	6,455	30,351	4,867	47,213
Adjustment for VDT net savings to shareholders				94,869	20,946	24,540	372,396	42,297	198,869	31,889	309,334
Adjustment for merger savings				(13,636)	(3,011)	(3,527)	(93,525)	(6,080)	(28,985)	(4,584)	(44,465)
Adjustment for MISO schedule 10 expenses				5,745	985	1,224	1,370	78	2,129	330	25,725
Adjustment for effect of accounting change				51,615	9,395	13,648	174,119	20,353	84,709	13,574	173,637
Adjustment for IT staff reduction				(3,009)	(664)	(778)	(11,812)	(1,342)	(6,308)	(1,011)	(9,813)
Adjustment to remove Alstom expenses				(21,302)	(3,654)	(4,540)	(5,081)	(290)	(7,892)	(1,225)	(95,384)
Adjustment for corporate lease expense											
Adjustment for sales tax refund				698	120	128	953	141	1,102	162	2,913
Adjustment for OMIJ Nox expense				13,351	2,290	2,846	3,184	182	4,947	768	59,783
Adjustment for ice storm				(28,589)	(6,163)	(11,514)	(43,003)	(3,368)	(46,641)	(7,132)	(10,180)
Adjustment for management audit fee				940	176	184	1,020	97	876	138	3,988
Adjustment for Retirement of Green River Units 1 & 2				(4,400)	(755)	(794)	(1,591)	(91)	(3,469)	(383)	(20,188)
VDT Amortization and Surcredit				(2,862)	(445)	(480)	(3,649)	(557)	(4,393)	(630)	(12,760)
Total Expense Adjustments				(218,172)	(45,190)	(29,512)	423,408	64,350	84,769	(3,507)	(1,091,994)
Total Operating Expenses		TOE		3,694,611	655,024	734,899	5,575,119	668,875	4,946,395	717,246	11,855,443
Net Operating Income (Adjusted)				366,726	27,266	13,773	(164,365)	122,546	1,464,133	179,090	2,290,420
Net Cost Rate Base				8,505,675	1,557,703	2,285,839	31,480,324	3,691,737	15,177,086	2,416,369	27,651,808
<b>Rate of Return</b>				<b>4.31%</b>	<b>1.75%</b>	<b>0.60%</b>	<b>-0.52%</b>	<b>3.32%</b>	<b>9.65%</b>	<b>7.41%</b>	<b>8.28%</b>

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

**AN ADJUSTMENT OF THE GAS AND ELECTRIC  
RATES, TERMS, AND CONDITIONS OF  
LOUISVILLE GAS AND ELECTRIC COMPANY**

)  
)  
)

**CASE NO.  
2003-00433**

**AND**

)  
)  
)

**AN ADJUSTMENT OF THE GAS AND ELECTRIC  
RATES, TERMS, AND CONDITIONS OF  
KENTUCKY UTILITIES COMPANY**

)  
)  
)

**CASE NO.  
2003-00434**

**EXHIBIT (SJB-5)**

KENTUCKY UTILITIES  
Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref.	Name	Allocation Vector	Total System	Residential Rate RS	All Electric Residential Rate FERS	General Service Secondary GSS	General Service Primary GSP
<b>Cost of Service Summary – Pro-Forma</b>								
<b>Operating Revenues</b>								
Total Operating Revenue – Actual				\$ 766,801,159	\$ 138,655,960	\$ 146,073,598	\$ 69,616,315	\$ 2,805,997
<b>Pro-Forma Adjustments:</b>								
Eliminate unbilled revenue				675,000	122,243	129,125	61,916	2,528
Adjustment for Mismatch in fuel cost recovery				(35,887,728)	(5,723,277)	(6,590,128)	(2,393,685)	(109,346)
Adjustment to Reflect Full Year of FAC Roll-in				1,417,623	181,543	182,116	86,991	4,709
Remove ECR revenues		FACRI		(25,039,979)	(4,562,377)	(4,715,925)	(2,291,842)	(91,531)
Remove off-system ECR revenues		ECRRI		17,986,813	3,208,163	3,428,757	1,647,196	66,930
Eliminate brokered sales		PLPPT		(776,418)	(158,416)	(130,792)	(76,153)	(2,028)
Eliminate ESM revenues collected		ESMREY		(22,575,569)	(3,600,306)	(4,145,611)	(1,505,781)	(68,786)
Eliminate ESM FAC ECR from rate refund acct.		ESMREY		(4,604,742)	(915,119)	(611,110)	(428,633)	(15,263)
Eliminate DSM Revenue		DSMREY		1,630,147	295,220	311,841	149,529	6,105
Year end adjustment		YREND		(2,942,935)	(1,508,819)	(1,089,604)	(222,733)	(10,743)
Merger savings				251,167	(417,181)	1,771,704	815,724	-
Adjustment for rate switching, increased intangible credit		RATESW		(2,564,289)	(464,390)	(490,535)	(235,213)	(9,603)
VDI Amortization and Surcredit		VDTREV		85,337	15,547	16,258	7,821	304
Total Pro-Forma Operating Revenue				\$ 683,449,939	\$ 125,128,790	\$ 134,139,695	\$ 65,241,451	\$ 2,579,272

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Combined Light & Power		Combined Light & Power		Large Commlnd TOD		High Load Factor Secondary		High Load Factor Primary	
				LPS	LPT	LPP	LPT	LCIP	LCIT	HLFS	HLFP		
<b>Cost of Service Summary -- Pro-Forma</b>													
<b>Operating Revenues</b>													
Total Operating Revenue -- Actual				\$ 177,515,062	\$ 39,811,312	\$ 605,181	\$ 75,027,425	\$ 21,183,217	\$ 13,972,612	\$ 26,276,986			
<b>Pro-Forma Adjustments:</b>													
Eliminate unbilled revenue			R01 Energy	\$ 154,859	\$ 34,715	\$ 526	\$ 64,886	\$ 18,376	\$ 12,117	\$ 22,783			
Adjustment for Mismatch in fuel cost recovery				(8,518,255)	(2,093,467)	(31,617)	(4,365,021)	(1,266,707)	(801,803)	(1,517,304)			
Adjustment to Reflect Full Year of FAC Roll-in			FACRI	\$ 365,749	\$ 85,293	\$ 2,524	\$ 194,737	\$ 94,994	\$ 53,661	\$ 62,851			
Remove ECR revenues			ECREV	(5,734,057)	(1,290,905)	(19,468)	(2,401,012)	(688,771)	(448,972)	(838,688)			
Adjustment to reflect Full Year of ECR Roll-in			ECRRI	\$ 4,133,849	\$ 917,554	\$ 14,085	\$ 1,735,467	\$ 492,058	\$ 315,548	\$ 606,165			
Remove off-system ECR revenues			PLPPT	(1,165,677)	(40,704)	(686)	(74,764)	(17,151)	(13,270)	(24,690)			
Eliminate brokered sales			Energy	(5,358,526)	(1,316,524)	(19,889)	(2,745,877)	(798,089)	(504,385)	(954,481)			
Eliminate ESM revenues collected			ESMREV	(1,152,341)	(264,123)	(3,614)	(474,129)	(137,016)	(82,283)	(160,666)			
Eliminate ESM, FAC, ECR from rate refund acct			R01	\$ 373,990	\$ 83,637	\$ 1,271	\$ 156,727	\$ 44,379	\$ 28,263	\$ 55,022			
Eliminate DSM Revenue			DSMREV	\$ (98,441)	\$ (12,123)	\$ (472)	\$ -	\$ -	\$ -	\$ -			
Year end adjustment			YREND	\$ (597,774)	\$ 117,795	\$ 273,166	\$ (2,000)	\$ (69,809)	\$ (46,031)	\$ (537,561)			
Merger savings			RATESW	\$ (588,297)	\$ (42,656)	\$ (2,000)	\$ (64,186)	\$ (120,793)	\$ -	\$ (86,551)			
Adjustment for rate switching, increased interruptible credit				\$ 19,479	\$ 4,382	\$ 66	\$ 8,140	\$ 2,334	\$ 1,514	\$ 2,828			
VDT Amortization and Surcredit			VDTREV	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -			
Total Pro-Forma Operating Revenue				\$ 160,329,520	\$ 35,861,908	\$ 818,844	\$ 66,815,888	\$ 18,735,062	\$ 12,483,970	\$ 22,906,692			
				(13,527,170)									

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Coal Mining Power		Large Power Mine		Large Power Mine		Combination Off-Peak CWH			
				Primary MPP	Transmission MPT	Power TOD LMP	Power TOD LMP	Transmission LMP	Peak				
<b>Cost of Service Summary -- Pro-Forma</b>													
<b>Operating Revenues</b>													
Total Operating Revenue -- Actual				\$	5,629,555	\$	4,538,092	\$	2,195,076	\$	5,412,231	\$	507,806
Pro-Forma Adjustments:													
Eliminate unbilled revenue				\$	4,976	\$	3,978	\$	1,924	\$	4,748	\$	432
Adjustment for Mismatch in fuel cost recovery			R01 Energy	\$	(268,036)	\$	(234,296)	\$	(118,074)	\$	(276,483)	\$	(28,144)
Adjustment to Reflect Full Year of FAC Roll-in		FACRI		\$	12,843	\$	13,496	\$	2,865	\$	11,438	\$	1,179
Remove ECR revenues		EGRREV		\$	(182,407)	\$	(145,445)	\$	(70,105)	\$	(172,666)	\$	(15,723)
Adjustment to reflect Full Year of ECR Roll-in		EGRRI		\$	132,466	\$	105,333	\$	51,614	\$	127,076	\$	11,770
Remove off-system ECR revenues			PLPPT Energy	\$	(4,473)	\$	(3,908)	\$	(1,723)	\$	(4,920)	\$	(637)
Eliminate brokered sales		ESMREV		\$	(168,612)	\$	(147,387)	\$	(74,276)	\$	(173,926)	\$	(17,704)
Eliminate ESM revenues collected		YREND		\$	(33,069)	\$	(25,314)	\$	(11,418)	\$	(28,011)	\$	(2,590)
Eliminate ESM, FAC, ECR from rate refund acct.		RATESW		\$	12,018	\$	9,806	\$	4,648	\$	11,466	\$	1,042
Eliminate DSM Revenue				\$	(234,645)	\$	(275,257)	\$	-	\$	(703,778)	\$	(22,542)
Year end adjustment				\$	(18,905)	\$	(15,111)	\$	(7,311)	\$	(18,037)	\$	(1,639)
Merger savings				\$	619	\$	493	\$	236	\$	579	\$	52
Adjustment for rate switching, increased interruptible credit				\$	(13,527,170)	\$	3,824,281	\$	1,973,457	\$	4,189,718	\$	433,102
VDT Amortization and Surrestall				\$		\$		\$		\$		\$	
Total Pro-Forma Operating Revenue				\$	4,882,311	\$	3,824,281	\$	1,973,457	\$	4,189,718	\$	433,102

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	All Electric School		Electric Space		Water Pumping		Street Lighting		Decorative Street Lighting		Private Outdoor Lighting		Customer Outdoor Lighting		Special Contracts	
				AES	Heating Rider	M	St Lt	Dec St Lt	PO Lt	C O Lt									
<b>Cost of Service Summary – Pro-Forma</b>																			
<b>Operating Revenues</b>																			
Total Operating Revenue – Actual				\$	4,507,053	\$	777,396	\$	819,029	\$	5,595,719	\$	814,583	\$	6,520,320	\$	959,498	\$	18,981,135
Pro-Forma Adjustments:																			
Eliminate unbilled revenue			R01	\$	3,911	\$	675	\$	717	\$	5,345	\$	790	\$	6,178	\$	907	\$	16,335
Adjustment for Mismatch in fuel cost recovery				\$	(217,983)	\$	(37,387)	\$	(37,004)	\$	(87,643)	\$	(5,009)	\$	(135,957)	\$	(21,106)	\$	(1,007,994)
Adjustment to Reflect Full Year of FAC Roll-In		FACRI		\$	9,719	\$	881	\$	1,457	\$	(1,021)	\$	(74)	\$	(3,573)	\$	(2,582)	\$	45,827
Remove ECR revenues		ECRREV		\$	(143,373)	\$	(23,364)	\$	(26,381)	\$	(196,772)	\$	(29,280)	\$	(227,715)	\$	(33,264)	\$	(691,956)
Adjustment to reflect Full Year of ECR Roll-in		ECRRI		\$	104,270	\$	17,741	\$	19,017	\$	144,194	\$	21,362	\$	166,721	\$	24,887	\$	493,730
Remove off-system ECR revenues		PLPPT		\$	(6,483)	\$	(1,112)	\$	(1,055)	\$	-	\$	-	\$	-	\$	-	\$	(27,376)
Eliminate brokered sales		ESMREV		\$	(137,125)	\$	(23,519)	\$	(23,278)	\$	(55,133)	\$	(3,151)	\$	(85,526)	\$	(13,277)	\$	(634,063)
Eliminate ESM revenues collected		ESMREV		\$	(21,989)	\$	(4,856)	\$	(4,856)	\$	(37,564)	\$	(5,964)	\$	(43,690)	\$	(6,279)	\$	(133,593)
Eliminate ESM FAC ECR from rate refund acct.		ESMREV		\$	9,445	\$	1,630	\$	1,730	\$	12,909	\$	1,508	\$	14,921	\$	2,192	\$	39,449
Year end adjustment		YREND		\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Merger savings		RATESW		\$	(14,857)	\$	(2,564)	\$	(2,722)	\$	(20,307)	\$	(3,001)	\$	(23,470)	\$	(3,447)	\$	(62,054)
Adjustment for rate switching, increased interruptible credit				\$	491	\$	81	\$	90	\$	667	\$	102	\$	802	\$	115	\$	2,335
VDT Amortization and Surcredit				\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-	\$	-
Total Pro-Forma Operating Revenue				\$	4,093,069	\$	691,733	\$	746,744	\$	5,377,223	\$	804,505	\$	6,260,441	\$	888,250	\$	14,244,013

KENTUCKY UTILITIES  
Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate RS	All Electric Residential Rate FERS	General Service Secondary GSS	General Service Primary GSP
<b>Operating Expenses</b>								
Operation and Maintenance Expenses				\$ 546,721,322	\$ 109,776,204	\$ 109,265,181	\$ 48,405,462	\$ 1,460,330
Depreciation and Amortization Expenses				88,376,624	21,723,862	18,637,218	9,957,822	183,943
Regulatory Credits and Accretion Expenses				(8,656,053)	(1,756,127)	(1,458,160)	(849,010)	(22,615)
Property Taxes			NPT	8,211,450	2,093,584	1,716,557	920,028	17,280
Other Taxes				5,761,986	1,485,920	1,204,512	645,586	12,125
Gain Disposition of Allowances				(246,288)	(39,277)	(45,226)	(16,427)	(750)
State and Federal Income Taxes				26,915,585	(3,211,541)	2,720,603	2,853,933	396,774
Specific Assignment of Curtailable Service Rider Credit				(4,582,475)				
Allocation of Curtailable Service Rider Credits			SCP	4,582,475	934,980	771,944	449,462	11,972
<b>Adjustments to Operating Expenses:</b>								
Eliminate mismatch in fuel cost recovery				(31,644,777)	(5,046,623)	(5,810,987)	(2,110,684)	(96,419)
Remove ECR expenses				(248,468)	(45,272)	(46,795)	(22,742)	(608)
Eliminate brokered sales expenses				(24,729,742)	(3,943,832)	(4,541,167)	(1,648,456)	(75,349)
Eliminate DSM Expenses				(2,945,471)	(1,510,632)	(1,090,913)	(223,001)	(10,756)
Year end adjustment				151,410	(251,488)	1,066,029	491,740	-
Depreciation adjustment								
Adjustment for change in depreciation rate				2,091,278	514,058	441,017	235,634	4,353
Labor adjustment				1,002,076	259,468	226,122	108,618	2,043
Medical Expense (See Functional Assignment)								
Adjustment for pension/post retir benefit (See Functional Assignment)				(473,014)	(168,017)	(153,325)	(69,375)	(554)
Storm damage adjustment								
Eliminate advertising expenses (See Functional Assignment)				56,333	10,864	11,159	5,351	218
Amortization for amortization of ESM audit expense				352,456	70,512	69,541	29,807	938
Remove Amortization of one-utility costs (See Functional Assignment)								
Adjustment for VDT net savings to shareholders				2,895,000	749,660	653,266	313,788	5,901
Adjustment for merger savings				16,968,825	4,911,976	4,280,374	2,056,091	38,668
Adjustment for merger amortization expenses				(2,726,510)	(706,030)	(615,245)	(295,535)	(6,558)
Adjustment for MISO schedule 10 expenses				843,344	172,071	142,065	82,718	2,203
Adjustment for effect of accounting change				9,434,618	2,073,316	1,778,726	950,369	17,555
Adjustment for IT staff reduction				(601,682)	(155,906)	(135,771)	(65,218)	(1,227)
Adjustment to remove Alstom expenses				(3,126,985)	(638,013)	(526,760)	(306,704)	(6,170)
Adjustment for corporate lease expense								
Adjustment for sales tax refund				120,391	21,803	23,030	11,043	451
Adjustment for OMU Nox expense				1,959,879	399,882	330,153	192,230	5,120
Adjustment for ice storm				(5,277,336)	(1,874,538)	(1,710,617)	(774,008)	(6,178)
Adjustment for management audit fee				163,982	32,806	32,354	13,868	436
Adjustment for Retirement of Green River Units 1 & 2				(705,035)	(119,554)	(127,043)	(52,038)	(2,079)
VDT Amortization and Succredit				(466,280)	(84,947)	(88,835)	(42,731)	(1,661)
VDT Expense Adjustments				(35,904,718)	(5,328,614)	(5,791,622)	(1,120,224)	(130,970)
Total Operating Expenses				\$ 633,180,928	\$ 125,499,010	\$ 126,021,005	\$ 59,046,633	\$ 1,928,089
Net Operating Income (Adjusted)				\$ 60,269,011	\$ (370,219)	\$ 8,118,690	\$ 6,194,817	\$ 651,183
Net Cost Rate Base				\$ 1,412,033,543	\$ 350,876,204	\$ 394,587,081	\$ 160,356,384	\$ 2,881,654
Rate of Return				4.27%	-0.11%	2.07%	3.85%	22.80%

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 Cost of Service Study  
 Class Allocation  
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Description	Ref	Name	Allocation Vector	Combined Light & Power LPS	Combined Light & Power LPP	Combined Light & Power LPT	Large Commlnd TOD Primary LCP	Large Commlnd TOD Transmission LCIT	High Load Factor Secondary HIFS	High Load Factor Primary HLPF
<b>Operating Expenses</b>										
Operation and Maintenance Expenses				\$ 120,695,298	\$ 29,982,414	\$ 408,746	\$ 54,156,947	\$ 14,732,940	\$ 9,941,001	\$ 18,624,035
Depreciation and Amortization Expenses				16,657,830	3,365,392	51,650	6,123,938	1,282,070	1,117,719	2,013,840
Regulatory Credits and Accretion Expenses				(2,072,286)	(453,797)	(7,649)	(833,517)	(191,215)	(147,943)	(275,265)
Property Taxes				1,965,879	317,801	4,906	578,614	121,823	105,434	190,324
Other Taxes				1,098,782	223,002	3,442	406,015	85,483	73,984	133,551
Gain Disposition of Allowances				(58,459)	(14,367)	(217)	(29,856)	(8,707)	(5,503)	(10,413)
State and Federal Income Taxes				10,320,722	2,740,138	84,027	3,960,476	1,738,363	797,227	1,487,812
Specific Assignment of Curtailable Service Rider Credit				-	(181,381)	-	(271,654)	(499,037)	-	-
Allocation of Curtailable Service Rider Credits				\$ 1,097,059	\$ 240,238	\$ 4,049	\$ 441,260	\$ 101,228	\$ 78,321	\$ 145,724
<b>Adjustments to Operating Expenses:</b>										
Eliminate mismatch in fuel cost recovery				\$ (7,511,155)	\$ (1,845,959)	\$ (27,879)	\$ (3,848,851)	\$ (1,118,710)	\$ (707,007)	\$ (1,337,916)
Remove ECR expenses				(66,888)	(12,809)	(193)	(23,825)	(6,634)	(4,435)	(8,322)
Eliminate brokered sales expenses				(5,868,813)	(1,442,579)	(21,787)	(3,007,876)	(874,249)	(652,511)	(1,045,554)
Eliminate DSM Expenses				(86,589)	(12,138)	(473)	-	-	-	-
Year and adjustment				(360,354)	(71,010)	(16,672)	-	-	-	-
Depreciation adjustment				-	-	-	-	-	-	(324,056)
Adjustment for change in depreciation rate				394,178	79,636	1,222	144,912	30,338	26,449	47,654
Labor adjustment				187,226	33,263	482	62,263	14,605	11,690	21,090
Medical Expense (See Functional Assignment)				-	-	-	-	-	-	-
Adjustment for pension/profit retir benefit (See Functional Assignment)				(42,357)	(5,656)	-	(9,718)	-	(2,245)	(3,009)
Storm damage adjustment				-	-	-	-	-	-	-
Eliminate advertising expenses (See Functional Assignment)				-	-	-	-	-	-	-
Adjustment for amortization of ESM audit expense				13,383	3,000	45	5,608	1,588	1,047	1,969
Amortization of rate case expenses				77,525	17,331	263	34,785	9,463	6,365	11,963
Remove Amortization of one-utility costs (See Functional Assignment)				-	-	-	-	-	-	-
Adjustment for injuries and damages account 925 (See Functional Assignment)				-	-	-	-	-	-	-
Adjustment for VDT net savings to shareholders				540,855	96,097	1,392	179,877	42,195	33,774	60,929
Adjustment for merger savings				3,544,093	629,656	9,118	1,178,601	276,473	221,295	399,222
Adjustment for MISO schedule 10 expenses				(509,415)	(90,505)	(1,311)	(169,408)	(39,739)	(57,383)	(97,383)
Adjustment for effect of accounting change				201,889	44,213	745	81,208	16,630	14,414	26,619
Adjustment for IT staff reduction				1,569,814	321,191	4,929	584,465	122,360	106,674	192,200
Adjustment to remove Alstom expenses				(112,417)	(19,972)	(289)	(37,385)	(6,770)	(7,019)	(12,663)
Adjustment for corporate lease expense				(748,612)	(163,934)	(2,763)	(301,107)	(69,076)	(53,444)	(98,439)
Adjustment for sales tax refund				27,620	6,192	94	11,575	3,278	2,161	4,064
Adjustment for OMU Nox expense				468,201	102,747	1,732	188,722	43,294	33,497	62,325
Adjustment for ice storm				(472,573)	(63,098)	-	(108,425)	-	(25,051)	(33,566)
Adjustment for management audit fee				36,069	8,064	122	16,184	4,403	2,971	5,566
Adjustment for Retirement of Green River Units 1 & 2				(167,673)	(40,184)	(622)	(81,707)	(22,806)	(14,913)	(28,135)
VDT Amortization and Surcredit				(106,432)	(23,944)	(383)	(44,478)	(12,752)	(8,271)	(15,454)
Total Expense Adjustments				(8,974,354)	(2,308,377)	128,136	(5,144,679)	(1,586,310)	(946,348)	(2,131,697)
Total Operating Expenses				\$ 140,530,471	\$ 30,911,052	\$ 678,091	\$ 59,387,445	\$ 15,776,639	\$ 11,013,892	\$ 20,177,910
Net Operating Income (Adjusted)				\$ -	\$ 4,950,846	\$ 140,753	\$ 7,428,444	\$ 2,958,424	\$ 1,470,078	\$ 2,728,782
Net Cost Rate Base				\$ 298,584,025	\$ 51,991,165	\$ 784,972	\$ 94,900,421	\$ 19,860,683	\$ 17,404,133	\$ 31,259,117
<b>Rate of Return</b>				<b>7.63%</b>	<b>9.52%</b>	<b>17.83%</b>	<b>7.83%</b>	<b>14.90%</b>	<b>8.45%</b>	<b>8.73%</b>

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Description	Ref	Name	Allocation Vector	Coal Mining Power Primary MPP	Coal Mining Power Transmission MPT	Large Power Mine Power TOD Primary LMP	Large Power Mine Power TOD Transmission LMPT	Combination Off-Peak CWH
<b>Operating Expenses</b>								
Operation and Maintenance Expenses				\$ 3,348,701	\$ 2,845,493	\$ 1,435,379	\$ 3,400,454	\$ 1,197,352
Depreciation and Amortization Expenses				383,454	283,671	151,006	368,710	288,103
Regulatory Credits and Accretion Expenses				(49,867)	(43,373)	(19,206)	(54,850)	(9,331)
Property Taxes			NPT	36,135	27,913	14,212	35,029	26,081
Other Taxes				25,356	19,587	9,973	24,560	18,301
Gain Disposition of Allowances				(1,839)	(1,608)	(810)	(1,897)	(193)
State and Federal Income Taxes				585,697	409,736	190,256	416,392	(460,488)
Specific Assignment of Curtailable Service Rider Credit			TXINCPF					
Allocation of Curtailable Service Rider Credits			SCP	\$ 26,400	\$ 23,067	\$ 10,168	\$ 29,038	\$ 4,940
<b>Adjustments to Operating Expenses:</b>								
Eliminate mismatch in fuel cost recovery			Energy	\$ (236,347)	\$ (206,595)	\$ (104,115)	\$ (243,795)	\$ (24,816)
Remove ECR expenses			ECRREV	\$ (1,810)	\$ (1,443)	\$ (696)	\$ (1,713)	\$ (166)
Eliminate brokered sales expenses			Energy	\$ (184,700)	\$ (161,450)	\$ (81,563)	\$ (190,521)	\$ (19,393)
Eliminate DSM Expenses			DSMREV	\$ -	\$ -	\$ -	\$ -	\$ -
Year end adjustment			YREND	\$ (141,450)	\$ (165,932)	\$ -	\$ (424,256)	\$ (13,589)
Depreciation adjustment			DET	\$ 9,074	\$ 6,954	\$ 3,573	\$ 8,725	\$ 6,841
Adjustment for change in depreciation rate			DET	\$ 3,980	\$ 3,062	\$ 1,640	\$ 3,723	\$ 4,328
Labor adjustment			LBT	\$ -	\$ -	\$ -	\$ -	\$ -
Medical Expense (See Functional Assignment)			LBT	\$ -	\$ -	\$ -	\$ -	\$ -
Adjustment for pension/post retire benefit (See Functional Assignment)			SDALL	\$ (860)	\$ -	\$ (395)	\$ -	\$ (3,556)
Storm damage adjustment			REVUC	\$ -	\$ -	\$ -	\$ -	\$ -
Eliminate advertising expenses (See Functional Assignment)			RO1	\$ 430	\$ 344	\$ 166	\$ 410	\$ 37
Adjustment for amortization of ESM audit expense			OMT	\$ 2,151	\$ 1,828	\$ 922	\$ 2,184	\$ 769
Amortization of rate case expenses			LBT	\$ -	\$ -	\$ -	\$ -	\$ -
Remove Amortization of one-utility costs (See Functional Assignment)			OMT	\$ -	\$ -	\$ -	\$ -	\$ -
Adjustment for VDT net savings to shareholders			LBT	\$ 11,498	\$ 8,846	\$ 4,738	\$ 10,757	\$ 12,489
Adjustment for injuries and damages account 925 (See Functional Assignment)			LBT	\$ 75,941	\$ 57,959	\$ 31,045	\$ 70,484	\$ 81,898
Adjustment for merger savings			LBT	\$ (10,829)	\$ (8,331)	\$ (4,462)	\$ (10,131)	\$ (11,772)
Adjustment for MISO schedule 10 expenses			PLJRT	\$ 4,658	\$ 4,245	\$ 1,871	\$ 5,344	\$ 609
Adjustment for effect of accounting change			DET	\$ 36,587	\$ 28,047	\$ 14,412	\$ 35,190	\$ 27,582
Adjustment for IT staff reduction			LBT	\$ (2,800)	\$ (1,888)	\$ (885)	\$ (2,236)	\$ (2,598)
Adjustment to remove Alstom expenses			PLPPT	\$ (16,015)	\$ (15,741)	\$ (6,938)	\$ (19,815)	\$ (3,371)
Adjustment for corporate lease expense			LBT	\$ -	\$ -	\$ -	\$ -	\$ -
Adjustment for sales tax refund			RO1	\$ 888	\$ 709	\$ 343	\$ 847	\$ 77
Adjustment for O&M Nox expense			PLPPT	\$ 11,291	\$ 9,866	\$ 4,349	\$ 12,419	\$ 2,113
Adjustment for ice storm			SDALL	\$ (9,598)	\$ -	\$ (4,411)	\$ -	\$ (39,675)
Adjustment for management audit fee			OMT	\$ 1,001	\$ 850	\$ 429	\$ 1,016	\$ 358
Adjustment for Retirement of Green River Units 1 & 2			OMPPT	\$ (4,993)	\$ (4,364)	\$ (2,149)	\$ (5,213)	\$ (600)
VDT Amortization and Surcredit			VDTRV	\$ (3,381)	\$ (2,696)	\$ (1,291)	\$ (3,165)	\$ (286)
Total Expense Adjustments				\$ (457,264)	\$ (445,682)	\$ (143,317)	\$ (748,746)	\$ 17,608
Total Operating Expenses		TOE		\$ 3,896,772	\$ 3,128,805	\$ 1,647,660	\$ 3,467,710	\$ 1,083,372
Net Operating Income (Adjusted)				\$ 885,539	\$ 695,476	\$ 325,797	\$ 722,007	\$ (650,270)
Net Cost Rate Base				\$ 5,981,173	\$ 4,510,623	\$ 2,373,997	\$ 5,640,885	\$ 4,738,120
Rate of Return				15.48%	15.42%	13.73%	12.80%	-13.72%

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Description	Ref	Name	Allocation Vector	All Electric School AES	Electric Space Heating Rider 33	Wear Pumping M	Street Lighting St Lt	Decorative Street Lighting Dec St Lt	Private Outdoor Lighting PO Lt	Outdoor Lighting C O Lt	Customer Outdoor Lighting C O Lt	Special Contracts
<b>Operating Expenses</b>												
Operation and Maintenance Expenses				3,328,612	621,342	605,138	3,219,253	312,394	2,930,668	416,377		13,911,603
Depreciation and Amortization Expenses				628,973	113,731	137,985	1,730,160	207,967	741,212	119,502		2,095,125
Regulatory Credits and Accretion Expenses				(72,276)	(12,386)	(11,759)						(305,209)
Property Taxes				38,968	10,619	12,713	153,788	18,476	65,883	10,622		198,780
Other Taxes				41,378	7,451	8,921	107,813	12,965	46,230	7,453		139,485
Gain Disposition of Allowances				(1,496)	(257)	(3,851)	(601)	(34)	(933)	(145)		(6,916)
State and Federal Income Taxes				52,369	(14,861)	(3,851)	(231,071)	58,013	1,012,992	125,405		887,604
Specific Assignment of Curtilable Service Rider Credit												(3,630,403)
Allocation of Curtilable Service Rider Credits				38,263	6,563	6,225						161,576
<b>Adjustments to Operating Expenses:</b>												
Eliminate mismatch in fuel cost recovery				(192,211)	(32,967)	(32,629)	(77,281)	(4,417)	(119,883)	(18,611)		(888,821)
Remove ECR expenses				(1,423)	(232)	(262)	(1,953)	(281)	(2,260)	(830)		(6,866)
Eliminate brokered sales expenses				(150,208)	(25,763)	(25,499)	(60,394)	(3,452)	(93,666)	(14,544)		(694,595)
Eliminate DSM Expenses												
Year end adjustment					(11,965)		10,181	7,379	43,060	(11,571)		
Depreciation adjustment												
Adjustment for change in depreciation rate				14,807	2,691	3,296	40,942	4,919	17,539	2,828		49,577
Labor adjustment				5,517	1,193	1,266	19,138	2,204	9,677	1,556		17,905
Medical Expense (See Functional Assignment)												
Adjustment for pension/boat retir benefit (See Functional Assignment)												
Storm damage adjustment				(2,563)	(552)	(1,032)	(3,654)	(302)	(4,091)	(639)		(912)
Eliminate advertising expenses (See Functional Assignment)												
Adjustment for amortization of ESM audit expense				338	58	62	462	68	534	78		1,412
Amortization of rate case expenses				2,138	399	389	2,068	201	1,690	267		6,936
Remove Amortization of one-utility costs (See Functional Assignment)												
Adjustment for injuries and damages account 925 (See Functional Assignment)												
Adjustment for VDT net savings to shareholders				15,938	3,447	3,657	55,291	6,367	27,956	4,495		51,727
Adjustment for merger savings				104,430	22,596	23,959	362,283	41,720	183,175	29,452		334,928
Adjustment for MISO schedule 10 expenses				(15,010)	(3,246)	(3,444)	(52,073)	(5,997)	(26,329)	(4,233)		(48,716)
Adjustment for effect of accounting change				7,042	1,208	1,148						23,736
Adjustment for IT staff reduction				60,124	10,854	13,131	165,128	10,839	70,741	11,405		199,958
Adjustment to remove Aistom expenses				(3,312)	(716)	(760)	(11,491)	(1,323)	(5,810)	(934)		(10,751)
Adjustment for corporate lease expense				(26,110)	(4,476)	(4,246)						(10,257)
Adjustment for sales tax refund												
Adjustment for OMI Nox expense				588	120	128	953	141	1,102	162		2,913
Adjustment for ice storm				16,365	2,807	2,662						65,105
Adjustment for management audit fee				(28,598)	(6,163)	(11,514)	(43,003)	(3,368)	(45,641)	(7,132)		(10,180)
Adjustment for Retirement of Green River Units 1 & 2				995	186	181	962	93	786	124		4,157
VDT Amortization and Surcredit				(4,646)	(797)	(779)	(1,332)	(76)	(2,066)	(321)		(20,948)
Total Expense Adjustments				(2,682)	(445)	(490)	(3,643)	(557)	(4,383)	(630)		(17,760)
				(198,275)	(41,777)	(30,821)	402,384	63,148	52,110	(8,577)		(1,030,452)
Total Operating Expenses				3,877,516	690,396	723,785	5,381,845	672,829	4,548,162	670,638		12,421,193
Net Operating Income (Adjusted)				215,562	1,337	22,959	(4,622)	131,676	1,712,280	217,613		1,822,820
Net Cost Rate Base				9,812,655	1,761,871	2,206,421	30,099,258	3,612,804	13,031,725	2,083,315		31,684,458
Rate of Return				2.20%	0.08%	1.04%	-0.02%	3.64%	13.14%	10.45%		5.75%



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Description	Ref	Name	Allocation Vector	Total System	Residential Rate RS	All Electric Residential Rate FERS	General Service Secondary GSS	General Service Primary GSP
<b>Cost of Service Summary -- Pro-Forma</b>								
<b>Operating Revenues</b>								
Total Operating Revenue -- Actual				\$ 768,801,159	\$ 137,916,946	\$ 147,101,217	\$ 69,475,900	\$ 2,821,048
<b>Pro-Forma Adjustments:</b>								
Eliminate unbilled revenue				675,000	122,243	128,125	61,916	2,528
Adjustment for Mismatch in fuel cost recovery				(35,867,728)	(5,723,277)	(6,550,128)	(2,333,665)	(109,346)
Adjustment to Reflect Full Year of FAC Roll-in				1,417,623	181,543	182,116	96,991	4,709
Remove ECR revenues		FACRI		(25,039,978)	(4,562,377)	(4,715,929)	(2,291,842)	(91,531)
Adjustment to reflect Full Year of ECR Roll-in		ECRRI		17,986,813	3,206,163	3,428,757	1,647,196	66,930
Remove off-system ECR revenues				(778,416)	(131,620)	(168,052)	(71,062)	(2,574)
Eliminate brokered sales		PLPPT		(22,575,669)	(3,600,306)	(4,145,611)	(1,505,781)	(68,786)
Eliminate ESM revenues collected		ESMREV		(4,604,742)	(915,119)	(611,110)	(428,633)	(15,263)
Eliminate ESM FAC ECR from rate refund acct.		DSMREV		1,630,747	285,220	311,841	149,529	6,105
Year-end adjustment		YREND		(2,942,935)	(1,508,819)	(1,089,604)	(222,733)	(10,743)
Merger savings				251,167	(417,181)	1,771,704	815,724	-
Adjustment for rate switching, increased interruptible credit		RATESW		(3,005,567)	(464,350)	(490,535)	(235,213)	(9,603)
VDI Amortization and Surcredit		VDTREV		85,337	15,547	16,258	7,821	304
Total Pro-Forma Operating Revenue				\$ 693,449,939	\$ 124,416,572	\$ 135,130,054	\$ 65,106,127	\$ 2,563,777
				(13,500,374)				

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Description	Ref	Name	Allocation Vector	Combined Light & Power		Combined Light & Power		Large Commlnd TOD		Large Commlnd TOD		High Load Factor		High Load Factor	
				LPS	LPP	LPT	LCIP	LCIT	HLFS	HLFP	Secondary	Primary			
<b>Cost of Service Summary – Pro-Forma</b>															
<b>Operating Revenues</b>															
Total Operating Revenue – Actual				\$ 177,182,345	\$ 39,859,272	\$ 604,255	\$ 75,166,640	\$ 21,271,791	\$ 13,996,432	\$ 26,330,971					
Pro-Forma Adjustments:															
Eliminate unbilled revenue				\$ 154,859	\$ 34,715	\$ 526	\$ 64,896	\$ 18,376	\$ 12,117	\$ 22,783					
Adjustment for Mismatch in fuel cost recovery			R01 Energy	\$ (8,518,255)	\$ (2,093,467)	\$ (31,617)	\$ (4,365,021)	\$ (1,268,707)	\$ (801,803)	\$ (1,517,304)					
Adjustment to Reflect Full Year of FAC Roll-in		FACRI		\$ 365,749	\$ 85,293	\$ 2,324	\$ 194,737	\$ 94,994	\$ 53,661	\$ 62,851					
Remove ECR revenues		EGRREV		\$ (5,734,057)	\$ (1,290,905)	\$ (19,498)	\$ (2,401,012)	\$ (688,721)	\$ (446,972)	\$ (838,698)					
Adjustment to reflect Full Year of ECR Roll-in		ECRRI		\$ 4,133,849	\$ 917,354	\$ 14,085	\$ 1,735,487	\$ 492,058	\$ 316,548	\$ 606,165					
Remove off-system ECR revenues			PLPPT Energy	\$ (173,613)	\$ (42,443)	\$ (652)	\$ (79,812)	\$ (20,363)	\$ (14,134)	\$ (26,648)					
Eliminate brokered sales				\$ (9,388,526)	\$ (1,316,924)	\$ (19,889)	\$ (2,745,877)	\$ (798,098)	\$ (504,385)	\$ (954,481)					
Eliminate ESM revenues collected		ESMREV		\$ (1,152,341)	\$ (264,123)	\$ (3,814)	\$ (474,129)	\$ (137,016)	\$ (89,283)	\$ (160,668)					
Eliminate ESM FAC ECR from rate refund acct.			R01	\$ 373,990	\$ 83,837	\$ 1,271	\$ 156,727	\$ 44,379	\$ 29,283	\$ 55,022					
Eliminate DSM Revenue		DSMREV		\$ (98,441)	\$ (12,123)	\$ (472)	\$ -	\$ -	\$ -	\$ -					
Year end adjustment		YREND		\$ (597,774)	\$ 117,795	\$ 273,166	\$ (2,000)	\$ (69,809)	\$ (46,031)	\$ (86,551)					
Merger savings			R01	\$ (588,297)	\$ (42,866)	\$ -	\$ (64,186)	\$ (120,793)	\$ -	\$ -					
Adjustment for rate switching, increased interruptible credit		RATESW		\$ 19,479	\$ 4,382	\$ 66	\$ 8,140	\$ 2,334	\$ 1,514	\$ 2,828					
VOT Amortization and Surcredit			VDTREV	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -					
Total Pro-Forma Operating Revenue				\$ 160,008,866	\$ 35,908,129	\$ 817,952	\$ 66,950,064	\$ 18,820,425	\$ 12,506,927	\$ 22,956,719					

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 Cost of Service Study  
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Description	Ref	Name	Allocation Vector	Coal Mining Power		Large Power Line		Large Power Mine		Combination Off-Peak CWH
				Primary MPP	Transmission MPT	Power TOD LMP	Power TOD LMP	Power TOD LMP	Transmission LMP	
<b>Cost of Service Summary – Pro-Forma</b>										
<b>Operating Revenues</b>										
Total Operating Revenue – Actual				\$	5,660,987 \$	4,559,871 \$	2,216,475 \$	5,425,560 \$		508,911
Pro-Forma Adjustments:										
Eliminate unbilled revenue				\$	4,976 \$	3,978 \$	1,924 \$	4,748 \$		432
Adjustment for Mismatch in fuel cost recovery			R01 Energy	\$	(288,036) \$	(234,295) \$	(18,074) \$	(276,483) \$		(28,144)
Adjustment to Reflect Full Year of FAC Roll-in		FACRI		\$	12,843 \$	13,496 \$	2,865 \$	11,438 \$		1,179
Remove ECR revenues		ECRREV		\$	(182,407) \$	(145,445) \$	(70,105) \$	(172,666) \$		(15,723)
Adjustment to reflect Full Year of ECR Roll-in		ECRRI		\$	132,466 \$	105,333 \$	51,614 \$	127,076 \$		11,770
Remove off-system ECR revenues			PLPPT Energy	\$	(5,613) \$	(4,698) \$	(2,489) \$	(5,403) \$		(877)
Eliminate brokered sales				\$	(168,612) \$	(147,387) \$	(74,276) \$	(173,926) \$		(17,704)
Eliminate ESM revenues collected		ESMREV		\$	(33,089) \$	(25,314) \$	(11,418) \$	(28,011) \$		(2,590)
Eliminate ESM FAC/ECR from rate refund acct.			R01	\$	12,018 \$	9,806 \$	4,648 \$	11,466 \$		1,042
Eliminate DSM Revenue		DSMREV		\$	(234,645) \$	(275,257) \$	- \$	(703,778) \$		(22,542)
Year end adjustment		YREND		\$	(18,905) \$	(15,111) \$	(7,311) \$	(18,037) \$		(1,639)
Merger savings			R01	\$	- \$	- \$	- \$	- \$		-
Adjustment for rate switching, increased interruptible credit		RATESW		\$	619 \$	493 \$	236 \$	579 \$		52
VDI Amortization and Surcredit			VDTREV	\$	- \$	- \$	- \$	- \$		-
Total Pro-Forma Operating Revenue			(13,500,374) \$	\$	4,912,603 \$	3,845,270 \$	1,994,079 \$	4,202,563 \$		434,167

KENTUCKY UTILITIES  
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Description	Ref	Name	Allocation Vector	All Electric School AES	Electric Space Heating Rider 33	Water Pumping M	Street Lighting STL	Decorative Street Lighting Dec StLI	Private Outdoor Lighting POLI	Customer Outdoor Lighting C OLI	Special Contracts	
<b>Cost of Service Summary -- Pro-Forma</b>												
<b>Operating Revenues</b>												
Total Operating Revenue -- Actual				\$ 4,482,389	\$ 776,874	\$ 817,460	\$ 5,609,441	\$ 815,367	\$ 6,541,571	\$ 962,798	\$ 18,686,630	
Pro-Forma Adjustments:												
Eliminate unbilled revenue				\$ 3,911	\$ 675	\$ 717	\$ 5,345	\$ 790	\$ 6,178	\$ 907	\$ 16,335	
Adjustment for Mismatch in fuel cost recovery				\$ (217,983)	\$ (37,387)	\$ (37,004)	\$ (87,643)	\$ (5,009)	\$ (105,957)	\$ (21,106)	\$ (1,007,994)	
Adjustment to Reflect Full Year of FAC Roll-in				\$ 9,719	\$ 881	\$ 1,457	\$ (1,021)	\$ (74)	\$ (3,573)	\$ (2,582)	\$ 45,627	
Remove ECR revenues		FACRI		\$ (143,373)	\$ (23,364)	\$ (26,381)	\$ (198,772)	\$ (29,280)	\$ (227,715)	\$ (33,264)	\$ (691,956)	
Adjustment to reflect Full Year of ECR Roll-in		ECRRI		\$ 104,270	\$ 17,741	\$ 19,017	\$ 144,134	\$ 21,362	\$ 166,721	\$ 24,687	\$ 493,730	
Remove off-system ECR revenues		PLPPT		\$ (5,951)	\$ (1,093)	\$ (998)	\$ (498)	\$ (28)	\$ (771)	\$ (120)	\$ (16,698)	
Eliminate brokered sales		Energy		\$ (137,125)	\$ (23,519)	\$ (23,278)	\$ (55,133)	\$ (3,151)	\$ (85,526)	\$ (13,277)	\$ (634,093)	
Eliminate ESM revenues collected		ESMREV		\$ (21,999)	\$ 1,124	\$ (4,856)	\$ (37,564)	\$ (5,964)	\$ (43,690)	\$ (6,279)	\$ (133,593)	
Eliminate ESM, FAC, ECR from rate refund acct.		R01		\$ 9,445	\$ 1,630	\$ 1,730	\$ 12,909	\$ 1,308	\$ 14,921	\$ 2,192	\$ 39,448	
Eliminate DSM Revenue		DSMREV		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Year end adjustment		YREND		\$ -	\$ (19,848)	\$ -	\$ 16,889	\$ 12,240	\$ 71,430	\$ (19,194)	\$ -	
Merger savings		RATESW		\$ (14,857)	\$ (2,564)	\$ (2,722)	\$ (20,307)	\$ (3,001)	\$ (23,470)	\$ (3,447)	\$ (62,054)	
Adjustment for rate switching, increased interruptible credit		VDTREY		\$ 491	\$ 81	\$ 90	\$ 667	\$ 102	\$ 802	\$ 115	\$ 2,335	
VDT Amortization and Surcredit				\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
Total Pro-Forma Operating Revenue				\$ 4,078,936	\$ 691,230	\$ 745,233	\$ 5,390,448	\$ 805,262	\$ 6,280,921	\$ 891,430	\$ 13,950,186	

KENTUCKY UTILITIES  
Cost of Service Study  
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Description	Ref	Name	Allocation Vector	Total System	Residential Rate RS	All Electric Residential Rate FERS	General Service Secondary GSS	General Service Primary GSP
<b>Operating Expenses</b>								
Operation and Maintenance Expenses				548,721,322 \$	105,660,558 \$	113,988,105 \$	45,623,478 \$	1,544,149 \$
Depreciation and Amortization Expenses				88,376,624 \$	19,722,676 \$	21,419,953 \$	9,577,587 \$	224,699 \$
Regulatory Credits and Accretion Expenses				(8,656,053) \$	(1,467,394) \$	(1,873,558) \$	(792,250) \$	(28,698) \$
Property Taxes			NPT	8,211,450 \$	1,813,418 \$	1,980,988 \$	883,896 \$	21,153 \$
Other Taxes				5,761,998 \$	1,272,480 \$	1,380,064 \$	620,232 \$	14,843 \$
Gain Disposition of Allowances				(246,288) \$	(39,277) \$	(45,226) \$	(16,427) \$	(750) \$
State and Federal Income Taxes				25,916,996 \$	(728,540) \$	(732,092) \$	3,125,711 \$	346,205 \$
Specific Assignment of Curtailable Service Rider Credit				(4,582,475) \$				
Allocation of Curtailable Service Rider Credits			SCP	4,582,475 \$	934,980 \$	771,944 \$	449,462 \$	11,972 \$
<b>Adjustments to Operating Expenses:</b>								
Eliminate mismatch in fuel cost recovery				(31,644,777) \$	(5,046,623) \$	(5,810,987) \$	(2,110,664) \$	(96,419) \$
Remove ECR expenses				(248,468) \$	(45,272) \$	(46,795) \$	(22,742) \$	(908) \$
Eliminate brokered sales expenses				(24,729,742) \$	(3,943,832) \$	(4,541,167) \$	(1,648,456) \$	(75,349) \$
Eliminate DSM Expenses				(2,846,471) \$	(1,510,632) \$	(1,090,913) \$	(223,001) \$	(10,756) \$
Year end adjustment				151,410 \$	(251,488) \$	1,068,029 \$	491,740 \$	
Depreciation adjustment								
Adjustment for change in depreciation rate				2,091,278 \$	466,703 \$	506,866 \$	226,637 \$	5,317 \$
Labor adjustment				1,002,076 \$	248,151 \$	241,886 \$	105,464 \$	2,274 \$
Medical Expense (See Functional Assignment)								
Adjustment for pension/post-reir benefit (See Functional Assignment)				(473,014) \$	(168,017) \$	(153,325) \$	(69,375) \$	(554) \$
Storm damage adjustment								
Eliminate advertising expenses (See Functional Assignment)				58,333 \$	10,564 \$	11,169 \$	5,351 \$	218 \$
Adjustment for amortization of ESM audit expense				352,456 \$	67,868 \$	73,217 \$	29,305 \$	992 \$
Amortization of rate case expenses								
Remove Amortization of one-utility costs (See Functional Assignment)				2,895,000 \$	716,908 \$	698,809 \$	307,575 \$	6,568 \$
Adjustment for VDT net savings to shareholders				18,968,825 \$	4,697,374 \$	4,378,784 \$	2,015,316 \$	43,038 \$
Adjustment for merger savings				(2,726,510) \$	(675,183) \$	(658,138) \$	(289,674) \$	(6,186) \$
Adjustment for merger amortization expenses				843,344 \$	142,956 \$	182,537 \$	77,187 \$	2,796 \$
Adjustment for MISO schedule 10 expenses				8,434,618 \$	1,882,322 \$	2,044,309 \$	914,080 \$	21,445 \$
Adjustment for effect of accounting change				(601,682) \$	(148,998) \$	(145,237) \$	(63,925) \$	(1,365) \$
Adjustment for IT staff reduction				(3,126,995) \$	(530,095) \$	(676,822) \$	(286,200) \$	(10,367) \$
Adjustment to remove Alstom expenses								
Adjustment for corporate lease expense				120,391 \$	21,803 \$	23,030 \$	11,043 \$	451 \$
Adjustment for sales tax refund				1,959,879 \$	322,243 \$	424,206 \$	179,379 \$	6,498 \$
Adjustment for OMU Nox expense				(5,277,336) \$	(1,974,586) \$	(1,710,617) \$	(774,068) \$	(6,178) \$
Adjustment for the storm				163,992 \$	31,576 \$	34,065 \$	13,634 \$	461 \$
Adjustment for management audit fee				(705,035) \$	(114,041) \$	(134,788) \$	(50,991) \$	(2,191) \$
Adjustment for Retirement of Green River Units 1 & 2				(466,280) \$	(84,947) \$	(88,839) \$	(42,731) \$	(1,661) \$
VDT Amortization and Surcredit				(35,904,716) \$	(5,775,189) \$	(5,170,648) \$	(1,205,074) \$	(121,875) \$
Total Expense Adjustments				633,180,928 \$	121,393,711 \$	131,729,540 \$	58,266,615 \$	2,011,697 \$
Total Operating Expenses		TOE		633,180,928 \$	121,393,711 \$	131,729,540 \$	58,266,615 \$	2,011,697 \$
Net Operating Income (Adjusted)				60,269,011 \$	3,022,861 \$	3,400,514 \$	6,839,512 \$	582,080 \$
Net Cost Rate Base				1,412,033,543 \$	321,541,172 \$	346,378,280 \$	154,782,645 \$	3,479,092 \$
Rate of Return				4.27%	0.94%	0.98%	4.42%	16.73%

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Description	Ref	Name	Allocation Vector	Combined Light & Power LPS	Combined Light & Power LPP	Combined Light & Power LPT	Large Comm/In TOD Primary LCIP	Large Comm/In TOD Transmission LCIT	High Load Factor Secondary HLFS	High Load Factor Primary HLFP	
<b>Operating Expenses</b>											
Operation and Maintenance Expenses				\$	\$	\$	\$	\$	\$	\$	
Depreciation and Amortization Expenses				118,842,359	27,249,511	403,589	54,932,301	15,226,217	10,073,657	18,924,679	
Regulatory Credits and Accrual Expenses				15,756,851	3,495,266	49,142	6,500,949	1,521,924	1,182,222	2,160,026	
Property Taxes				(1,937,791)	(473,184)	(7,274)	(889,795)	(227,019)	(157,572)	(297,087)	
Other Taxes				1,480,263	330,142	4,667	614,440	144,615	111,564	204,215	
Gain Disposition of Allowances				1,038,704	231,662	3,275	431,154	101,477	78,285	143,298	
State and Federal Income Taxes				(58,459)	(14,367)	(217)	(29,956)	(8,707)	(5,503)	(10,413)	
Specific Assignment of Curtailable Service Rider Credit				11,638,914	2,578,996	87,139	3,482,659	1,440,764	717,195	1,306,431	
Allocation of Curtailable Service Rider Credits				(181,381)	(41,381)	-	(21,654)	(489,037)	-	-	
Allocation of Curtailable Service Rider Credits				1,097,059	240,238	4,049	441,280	101,228	78,321	145,724	
<b>Adjustments to Operating Expenses:</b>											
Eliminate mismatch in fuel cost recovery				(7,511,155)	(1,845,959)	(27,879)	(3,848,951)	(1,118,710)	(707,007)	(1,337,916)	
Remove ECR expenses				(56,998)	(12,809)	(193)	(23,825)	(6,834)	(4,435)	(8,322)	
Eliminate brokered sales expenses				(5,869,813)	(1,442,579)	(21,787)	(3,007,876)	(874,249)	(552,511)	(1,045,554)	
Eliminate DSM Expenses				(98,559)	(12,136)	(473)	-	-	-	-	
Year end adjustment				(360,354)	71,010	164,672	-	-	-	(324,056)	
Depreciation adjustment				372,858	82,709	1,163	153,834	36,014	27,875	51,113	
Adjustment for change in depreciation rate				182,122	33,999	467	64,398	15,964	12,056	21,918	
Labor adjustment				-	-	-	-	-	-	-	
Medical Expense (See Functional Assignment)				-	-	-	-	-	-	-	
Adjustment for pension/post retir benefit (See Functional Assignment)				(42,357)	(5,656)	-	(9,718)	-	(2,245)	(3,009)	
Storm damage adjustment				-	-	-	-	-	-	-	
Eliminate advertising expenses (See Functional Assignment)				13,383	3,000	45	5,608	1,588	1,047	1,969	
Adjustment for amortization of ESM audit expense				76,335	17,503	259	35,284	9,780	6,471	12,156	
Amortization of rate case expenses				-	-	-	-	-	-	-	
Remove Amortization of one-utility costs (See Functional Assignment)				-	-	-	-	-	-	-	
Adjustment for VDT net savings to shareholders				526,150	98,223	1,350	186,047	46,120	34,829	63,321	
Adjustment for merger savings				3,447,476	643,584	8,849	1,219,030	302,193	228,212	414,898	
Adjustment for merger amortization expenses				(495,528)	(92,506)	(1,272)	(175,219)	(43,436)	(32,802)	(59,636)	
Adjustment for MISO schedule 10 expenses				188,796	46,102	709	86,691	22,118	15,352	28,945	
Adjustment for effect of accounting change				1,503,825	333,586	4,690	620,447	145,252	112,831	206,152	
Adjustment for IT staff reduction				(109,352)	(20,414)	(281)	(38,667)	(9,565)	(7,239)	(13,160)	
Adjustment to remove Alstom expenses				(700,026)	(170,938)	(2,628)	(321,438)	(82,011)	(56,923)	(107,323)	
Adjustment for corporate lease expense				-	-	-	-	-	-	-	
Adjustment for sales tax refund				27,620	6,192	94	11,575	3,278	2,161	4,064	
Adjustment for OMU Nex expense				438,749	107,137	1,647	201,465	51,401	35,677	67,266	
Adjustment for ice storm				(472,573)	(63,098)	-	(108,425)	-	(25,051)	(33,566)	
Adjustment for management audit fee				35,515	8,143	121	16,416	4,550	3,010	5,656	
Adjustment for Retirement of Green River Units 1 & 2				(165,193)	(40,541)	(615)	(82,745)	(23,467)	(15,091)	(28,537)	
VDT Amortization and Surcredit				(106,432)	(23,944)	(963)	(44,470)	(12,752)	(8,271)	(18,464)	
Total Expense Adjustments				(9,175,410)	(2,279,366)	128,577	(5,060,948)	(1,532,786)	(931,953)	(2,099,076)	
Total Operating Expenses		TOE		\$ 138,682,191	\$ 31,177,487	\$ 672,946	\$ 60,180,849	\$ 16,268,676	\$ 11,146,215	\$ 20,477,798	
Net Operating Income (Adjusted)				\$ 21,326,675	\$ 4,730,642	\$ 145,006	\$ 6,789,215	\$ 2,551,749	\$ 1,360,711	\$ 2,480,920	
Net Cost Rate Base				\$ 246,357,662	\$ 53,884,949	\$ 748,210	\$ 100,426,897	\$ 23,376,610	\$ 18,349,667	\$ 33,402,015	
<b>Rate of Return</b>				<b>8.66%</b>	<b>8.78%</b>	<b>19.38%</b>	<b>6.76%</b>	<b>10.92%</b>	<b>7.42%</b>	<b>7.43%</b>	

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Description	Ref	Name	Allocation Vector	Coal Mining Power Primary MPP	Coal Mining Power Transmission MPT	Large Power Line Power TOD Primary LMP	Large Power Line Power TOD Transmission LMPT	Combination Off-Peak CWH
<b>Operating Expenses</b>								
Operation and Maintenance Expenses				3,523,749	2,966,782	1,554,550	3,474,683	1,203,506
Depreciation and Amortization Expenses				468,571	352,846	208,952	404,804	292,095
Regulatory Credits and Accretion Expenses				(62,573)	(52,377)	(27,856)	(80,238)	(9,778)
Property Taxes		NPT		44,223	33,517	19,719	38,459	26,365
Other Taxes				31,031	23,519	13,837	26,987	18,501
Gain Disposition of Allowances				(1,839)	(1,608)	(810)	(1,887)	(193)
State and Federal Income Taxes				480,089	336,562	118,359	371,609	(464,200)
Specific Assignment of Curtailable Service Rider Credit								
Allocation of Curtailable Service Rider Credits		SCP		26,400	23,067	10,168	29,038	4,940
Adjustments to Operating Expenses:								
Eliminate mismatch in fuel cost recovery				(236,347)	(206,595)	(104,115)	(243,795)	(24,816)
Remove ECR expenses				(1,810)	(1,443)	(696)	(1,713)	(156)
Eliminate brokered sales expenses				(184,700)	(161,450)	(81,363)	(190,521)	(19,393)
Eliminate DSM Expenses				-	-	-	-	-
Year end adjustment				(141,450)	(165,932)	-	(424,256)	(13,589)
Depreciation adjustment				11,088	8,348	4,944	9,579	6,912
Adjustment for change in depreciation rate				4,462	3,398	1,968	3,928	4,343
Labor adjustment				-	-	-	-	-
Medical Expense (See Functional Assignment)				-	-	-	-	-
Adjustment for pension/retir benefit (See Functional Assignment)				(860)	-	(365)	-	(3,556)
Storm damage adjustment				-	-	-	-	-
Eliminate advertising expenses (See Functional Assignment)				430	344	166	410	37
Adjustment for amortization of ESM audit expense				2,263	1,906	989	2,232	773
Amortization of rate case expenses				-	-	-	-	-
Remove Amortization of one-utility costs (See Functional Assignment)				-	-	-	-	-
Adjustment for injuries and damages account 525 (See Functional Assignment)				12,892	9,811	5,686	11,346	12,548
Adjustment for VDT net savings to shareholders				84,469	64,283	37,259	74,354	82,219
Adjustment for merger savings				(12,141)	(9,240)	(5,356)	(10,887)	(11,818)
Adjustment for MISO schedule 10 expenses				6,096	5,103	2,714	5,669	953
Adjustment for effect of accounting change				44,720	33,675	19,942	38,634	27,877
Adjustment for IT staff reduction				(2,679)	(2,039)	(1,182)	(2,358)	(2,608)
Adjustment to remove Alstom expenses				(22,805)	(18,921)	(10,053)	(21,761)	(3,532)
Adjustment for corporate lease expense				888	709	343	847	77
Adjustment for sales tax refund				14,168	11,859	6,307	13,639	2,214
Adjustment for OMU Nox expense				(9,598)	-	(4,411)	-	(39,675)
Adjustment for ice storm				1,053	887	465	1,038	360
Adjustment for management audit fee				(5,227)	(4,527)	(2,388)	(5,313)	(688)
Adjustment for Retirement of Green River Units 1 & 2				(3,361)	(2,696)	(1,281)	(3,165)	(266)
VDT Amortization and Surcredit				(438,270)	(432,521)	(130,386)	(741,691)	16,276
Total Expense Adjustments				4,071,380	3,249,788	1,766,531	3,541,753	1,089,511
Total Operating Expenses		TOE		841,223	595,492	227,548	660,810	(655,344)
Net Operating Income (Adjusted)				7,228,861	5,375,126	3,223,008	6,169,967	4,781,983
Net Cost Rate Base				11.64%	11.08%	7.05%	10.71%	-13.70%





LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
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Description	Ref	Name	Allocation Vector	Total System	Residential Rate R	Water Heating Rate WH	General Service Rate GS	Rate LC Primary	Rate LC Secondary
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue – Actual				\$ 768,525,765	\$ 291,774,308	\$ 1,042,105	\$ 106,206,583	\$ 8,933,859	\$ 132,997,184
Pro-Forma Adjustments:									
Eliminate unbilled revenue				(1,867,000)	(715,724)	(2,428)	(271,251)	(21,339)	(322,331)
Mismatch in fuel cost recovery				(4,406,145)	(1,479,166)	(6,691)	(513,321)	(95,331)	(791,604)
To Reflect a Full Year of the FAC Roll-In		FACRI	Energy	547,241	181,639	1,202	87,109	11,617	139,923
Remove ECR revenues		ECRREV		(11,228,429)	(4,264,852)	(15,362)	(1,630,456)	(127,642)	(1,840,152)
To Reflect a Full Year of the ECR Roll-In		ECRRI		723,260	255,297	937	110,897	9,089	133,401
Remove off-system ECR revenues				(1,929,923)	(798,593)	(2,824)	(212,071)	(20,734)	(330,945)
Eliminate brokered sales		ESMREV	Energy	(22,608,445)	(7,589,772)	(34,335)	(2,633,910)	(289,304)	(4,061,814)
Eliminate ESM revenues				(6,974,780)	(2,763,963)	(7,154)	(1,009,115)	(80,480)	(1,196,285)
Eliminate Rate Refund Acct		DSMREV	R01	(7,150,231)	(2,741,076)	(9,299)	(1,038,835)	(81,725)	(1,234,463)
Year End Revenue Adjustment		YREND		(3,277,501)	(2,771,657)	-	(108,973)	(25,623)	(340,279)
Adjustment for Merger savings				2,614,347	1,232,278	(9,993)	(279,531)	-	932,854
Adjustment for Customer Rate Switching & CSR Credit		RATESW	R01	(2,756,795)	(1,057,598)	(3,588)	(400,817)	(31,532)	(476,296)
VDT Amortization and Surcredit				(621,927)	17,356	-	6,447	505	7,617
				44,485		57			
Total Pro-Forma Operating Revenue				\$ 708,631,942	\$ 269,278,378	\$ 952,526	\$ 98,312,757	\$ 8,208,359	\$ 123,516,811

BIP Prod Trans Allocation  
 Removes ECR Rate Base  
 Present Revenues reflect CSR incr  
 CSR Credits allocated on SCP

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LC-TOD		Rate LC-TOD		Rate LP Primary	Rate LP Secondary	Rate LP-TOD Transmission	Rate LP-TOD Primary
				Primary	Secondary	Primary	Secondary				
<b>Cost of Service Summary -- Pro-Forma</b>											
<b>Operating Revenues</b>											
Total Operating Revenue - Actual				\$ 14,652,107	\$ 19,054,006	\$ 6,245,422	\$ 34,323,004	\$ 16,876,390	\$ 80,727,953		
Pro-Forma Adjustments:											
Eliminate unbilled revenue			R01 Energy	(34,589)	(45,400)	(14,766)	(83,348)	(37,176)	(183,683)		
Mismatch in fuel cost recovery				(98,406)	(118,766)	(42,016)	(212,910)	(136,932)	(601,261)		
To Reflect a Full Year of the FAC Roll-In				16,117	24,738	5,030	28,206	10,866	20,892		
Remove ECR revenues		FACRI		(207,809)	(275,776)	(89,065)	(505,167)	(223,730)	(1,130,594)		
To Reflect a Full Year of the ECR Roll-In		ECRREV		14,884	21,249	5,484	35,195	16,754	67,122		
Remove off-system ECR revenues		ECRRI		(35,905)	(50,917)	(14,985)	(75,351)	(46,325)	(217,365)		
Eliminate brokered sales			PLPPT Energy	(504,933)	(609,504)	(215,566)	(1,092,468)	(712,877)	(3,085,143)		
Eliminate ESM revenues				(130,047)	(164,826)	(53,219)	(301,827)	(135,771)	(645,195)		
Eliminate Rate Refund Acct		ESMREV		(132,469)	(173,873)	(56,551)	(319,207)	(142,363)	(703,468)		
Eliminate DSM Revenue		DSMREV		(14,688)	(16,281)	-	147,900	-	-		
Year End Revenue Adjustment		YREND		-	(67,066)	(21,819)	(123,161)	(54,936)	(271,421)		
Adjustment for Merger savings		RATESW		(51,111)	-	-	-	(279,699)	(252,228)		
Adjustment for Customer Rate Switching & CSR Credit				-	1,070	349	1,955	867	4,284		
VDT Amortization and Surcredit		VDTREX		815	-	-	-	-	-		
Total Pro-Forma Operating Revenue				\$ 13,473,965	\$ 18,144,692	\$ 5,748,275	\$ 31,822,823	\$ 15,133,047	\$ 73,729,592		

BIP Prod Trans Allocation  
 Removes ECR Rate Base  
 Present Revenues reflect CSR incr  
 CSR Credits allocated on SCP

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LP-TOD Secondary	Street Lighting Rate PSL	Street Lighting Rate SLE	Street Lighting Rate OL	Street Lighting Rate TLE	Special Contracts
<b>Cost of Service Summary -- Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue -- Actual				\$ 2,667,730	\$ 5,832,231	\$ 207,928	\$ 7,037,493	\$ 727,497	\$ 39,220,086
Pro-Forma Adjustments:									
Eliminate unbilled revenue			R01 Energy	(6,454)	(15,890)	(464)	(19,577)	(1,786)	(90,792)
Mismatch in fuel cost recovery				(16,458)	(19,759)	(1,535)	(20,526)	(4,410)	(282,033)
To Reflect a Full Year of the FAC Roll-In		FACRI		1,436	(3,891)	136	(1,432)	797	23,036
Remove ECR revenues		ECRREV		(40,296)	(96,342)	(3,010)	(121,526)	(11,097)	(543,453)
To Reflect a Full Year of the ECR Roll-In		ECRRI		3,088	6,611	212	9,072	811	33,157
Remove off-system ECR revenues			PLPPT Energy	(6,192)	(8,400)	(669)	(8,714)	(1,481)	(98,352)
Eliminate brokered sales				(84,446)	(101,383)	(7,875)	(105,321)	(22,630)	(1,447,143)
Eliminate ESM revenues		ESMREV		(20,232)	(57,193)	(1,416)	(65,875)	(6,308)	(335,874)
Eliminate Rate Refund Act			R01	(24,719)	(60,854)	(1,778)	(74,974)	(6,841)	(347,716)
Eliminate DSM Revenue		DSMREV		-	-	-	-	-	-
Year End Revenue Adjustment		YREND		-	2,999	(1,159)	17,114	5,808	-
Adjustment for Merger Savings			R01	(9,537)	(23,479)	(666)	(28,928)	(2,639)	(134,190)
Adjustment for Customer Rate Switching & CSR Credit		RATESW		146	364	10	453	41	(90,000)
VDT Amortization and Surcredit			VDTREV	-	-	-	-	-	2,148
Total Pro-Forma Operating Revenue				\$ 2,464,065	\$ 5,453,014	\$ 189,714	\$ 6,617,260	\$ 677,761	\$ 35,908,904

BIP Prod Trans Allocation  
 Remove ECR Rate Base  
 Present Revenues reflect CSR Incr  
 CSR Credits allocated on SCP

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate R	Water Heating Rate WH	General Service Rate GS	Rate LC Primary	Rate LC Secondary
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				508,148,420 \$	203,882,981 \$	1,176,453 \$	60,345,199 \$	5,773,024 \$	82,923,255
Depreciation and Amortization Expenses				95,827,965	44,533,075	340,924	11,122,256	851,366	13,983,904
Accretion Expense				462,519	191,388	701	50,824	4,969	79,313
Property and Other Taxes			NPT	12,603,252	5,805,546	42,776	1,456,554	113,849	1,864,962
Amortization of Investment Tax Credit				(4,010,380)	(1,847,338)	(13,611)	(463,478)	(36,227)	(583,435)
Other Expenses				(6,055,342)	(2,789,325)	(20,552)	(699,814)	(54,700)	(896,037)
State and Federal Income Taxes			TXINCPF	27,184,243 \$	89,824 \$	(288,624) \$	8,582,119 \$	521,850 \$	8,264,388
Specific Assignment of Interruptible Credit				(3,519,894)					
Allocation of Interruptible Credits			SCP	3,519,894 \$	1,511,175 \$	2,563 \$	514,921 \$	41,545 \$	625,034
<b>Adjustments to Operating Expenses:</b>									
Eliminate mismatch in fuel cost recovery			Energy	(2,005,300) \$	(673,190) \$	(3,045) \$	(233,620) \$	(26,547) \$	(360,271)
Remove ECR expenses			ECRREV	(1,766,344) \$	(670,920) \$	(2,417) \$	(256,487) \$	(20,079) \$	(305,205)
Eliminate brokered sales expenses			Energy	(25,030,786) \$	(9,402,956) \$	(38,013) \$	(2,916,114) \$	(331,372) \$	(4,487,006)
Eliminate DSM Expenses			DSMREV	(3,280,013) \$	(2,773,781) \$		(109,057) \$	(25,643) \$	(340,540)
Year end Expense adjustment			YREND	1,458,544 \$	687,488 \$	(5,575) \$	(155,950) \$		520,439
Adjustment to annualize depreciation expense			DET	8,959,741 \$	4,163,762 \$	31,876 \$	1,039,911 \$	79,601 \$	1,307,470
Depreciation adjustment			DET						
Labor adjustment			LBT	918,580 \$	437,787 \$	3,194 \$	114,202 \$	8,491 \$	130,863
Adjustment for pension and post Ret Exp. (See Functional Assignment)			SDALL	70,492 \$	46,793 \$	894 \$	9,481 \$	283 \$	5,985
Storm damage adjustment			OMT	333,580 \$	133,841 \$	772 \$	39,614 \$	3,790 \$	54,436
Adjustment to eliminate advertising expenses (See Functional Assignment)			R01	58,333 \$	22,362 \$	76 \$	8,475 \$	687 \$	10,071
Amortization of rate case expenses									
Remove one-utility cost (See Functional Assignment)									
Adjustment for injuries and damages (See Functional Assignment)									
Adjustment for VDT net savings to shareholders			LBT	5,640,000 \$	2,687,975 \$	19,612 \$	701,192 \$	52,132 \$	803,485
Adjustment for merger savings			LBT	19,427,401 \$	9,258,932 \$	67,554 \$	2,415,307 \$	179,573 \$	2,767,663
Adjustment for merger amortization expenses			LBT	(2,722,005) \$	(1,297,284) \$	(9,465) \$	(338,413) \$	(25,160) \$	(367,782)
MISO Schedule 10 one time credit			PLTRT	709,577 \$	293,620 \$	1,075 \$	77,972 \$	7,623 \$	121,679
Adjustment cumulative effect of accounting change			DET	5,280,909 \$	2,454,139 \$	18,788 \$	612,928 \$	46,917 \$	770,828
Adjustment for IT staff reduction			LBT	(431,834) \$	(205,808) \$	(1,502) \$	(55,688) \$	(3,992) \$	(61,520)
Remove Alstom Expenses			PLPPT	(2,157,640) \$	(924,821) \$	(3,269) \$	(237,093) \$	(23,181) \$	(369,994)
Adjustment for obsolete inventory write-off			PLT	(1,373,632) \$	(633,760) \$	(4,861) \$	(158,753) \$	(12,377) \$	(202,830)
Adjustment for corporate office lease			LBT	1,796,420 \$	857,111 \$	6,254 \$	223,588 \$	16,623 \$	256,206
Adjustment for carbide lime write-off			Energy	(1,416,711) \$	(475,597) \$	(2,152) \$	(165,048) \$	(18,755) \$	(254,525)
Adjustment for Cane Run repair refund			PLPPT	3,986,000 \$	1,484,697 \$	5,436 \$	394,269 \$	38,548 \$	615,273
VDT Amortization and Surcredit			VDITREV	(224,718) \$	(87,676) \$	(286) \$	(32,570) \$	(2,549) \$	(38,490)
Total Expense Adjustments				7,534,614	6,414,712	84,946	980,157	(65,406)	546,054
Total Operating Expenses		TOE		641,996,290 \$	257,782,040 \$	1,325,576 \$	81,888,738 \$	7,160,270 \$	106,797,437
Net Operating Income – Pro-Forma				67,635,652 \$	11,486,338 \$	(373,051) \$	16,424,019 \$	1,048,089 \$	16,719,374
Net Cost Rate Base				1,473,843,556 \$	680,151,878 \$	5,062,926 \$	170,825,435 \$	13,283,070 \$	216,869,731
Rate of Return				4.59%	1.65%	-7.37%	9.61%	1.00%	7.71%

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LC-TOD Primary	Rate LC-TOD Secondary	Rate LP Primary	Rate LP Secondary	Rate LP-TOD Transmission	Rate LP-TOD Primary
<b>Cost of Service Summary - Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				9,676,987 \$	12,270,238 \$	4,189,373 \$	21,079,136 \$	12,933,219 \$	58,234,595
Depreciation and Amortization Expenses				1,450,038	2,078,048	622,783	3,224,777	1,688,978	8,610,365
Accretion Expense				8,605	12,203	3,591	18,058	11,102	52,093
Property and Other Taxes			NPT	194,215	278,048	83,186	429,566	228,575	1,155,432
Amortization of Investment Tax Credit				(61,600)	(86,475)	(26,470)	(136,688)	(72,733)	(367,661)
Other Expenses				(93,312)	(133,591)	(39,967)	(206,389)	(109,821)	(595,137)
State and Federal Income Taxes			TXINCPF	745,236 \$	1,070,672 \$	286,102 \$	2,496,379 \$	686,335 \$	2,276,389
Specific Assignment of Interruptible Credit				-	-	-	-	(1,637,062)	(1,396,833)
Allocation of Interruptible Credits			SCP	66,078 \$	84,505 \$	29,945 \$	140,138 \$	60,511 \$	270,035
Adjustments to Operating Expenses									
Eliminate mismatch in fuel cost recovery			Energy	(44,786) \$	(54,061) \$	(19,122) \$	(96,898) \$	(63,230) \$	(273,643)
Remove ECR expenses			ECRREV	(32,690) \$	(43,382) \$	(14,011) \$	(79,468) \$	(35,195) \$	(177,854)
Eliminate brokered sales expenses			Energy	(559,033) \$	(674,807) \$	(238,687) \$	(1,209,515) \$	(789,257) \$	(3,415,692)
Eliminate DSM Expenses			OSMREV	-	(16,293) \$	-	-	-	-
Year end Expense adjustment			YREND	-	315,814 \$	-	82,513 \$	-	-
Adjustment to annualize depreciation expense			DET	135,576 \$	194,294 \$	58,229 \$	301,511 \$	157,916 \$	805,053
Depreciation adjustment			DET	-	-	-	-	-	-
Labor adjustment			LBT	13,957 \$	18,905 \$	6,268 \$	31,008 \$	17,191 \$	83,240
Adjustment for pension and post Ret Exp. (See Functional Assignment)			SDALL	454 \$	719 \$	221 \$	1,509 \$	-	2,235
Storm damage adjustment			OMT	6,363 \$	8,055 \$	2,750 \$	13,638 \$	8,480 \$	38,229
Adjustment to eliminate advertising expense (See Functional Assignment)			R01	1,081 \$	1,418 \$	461 \$	2,604 \$	1,162 \$	5,739
Amortization of rate case expenses									
Amortization of ESM audit expenses									
Remove one-utility cost (See Functional Assignment)									
Adjustment for injuries and damages (See Functional Assignment)			LBT	85,697 \$	116,073 \$	38,487 \$	190,388 \$	105,554 \$	511,087
Adjustment for VDT net savings to shareholders			LBT	295,190 \$	399,821 \$	132,571 \$	655,807 \$	363,588 \$	1,760,479
Adjustment for merger savings			LBT	(41,360) \$	(56,020) \$	(18,575) \$	(91,666) \$	(50,943) \$	(246,664)
Adjustment for merger amortization expenses			PLTRT	13,201 \$	18,721 \$	5,510 \$	27,704 \$	17,032 \$	79,919
MISO Schedule 10 one time credit			DET	79,909 \$	114,518 \$	34,320 \$	177,712 \$	93,077 \$	474,502
Adjustment cumulative effect of accounting change			LBT	(6,562) \$	(8,887) \$	(2,947) \$	(14,577) \$	(8,082) \$	(39,132)
Adjustment for IT staff reduction			PLPPT	(40,142) \$	(56,925) \$	(16,753) \$	(84,242) \$	(51,791) \$	(243,013)
Remove Alstom Expenses			PLT	(21,108) \$	(30,225) \$	(9,045) \$	(46,727) \$	(24,803) \$	(125,542)
Adjustment for obsolete inventory write-off			LBT	27,326 \$	37,012 \$	12,272 \$	60,709 \$	33,658 \$	162,970
Adjustment for corporate office lease			Energy	(31,641) \$	(38,193) \$	(13,509) \$	(68,457) \$	(44,671) \$	(193,324)
Adjustment for carbide line write-off			PLPPT	66,753 \$	94,662 \$	27,859 \$	140,088 \$	86,124 \$	404,112
Adjustment for Cane Run repair refund			VDTREV	(4,116) \$	(5,407) \$	(1,762) \$	(9,674) \$	(4,381) \$	(21,640)
VDT Amortization and Surcredit				(70,639)	335,809	(15,461)	(16,253)	(188,580)	(408,937)
Total Expense Adjustments									
Total Operating Expenses		TOE		11,915,416 \$	15,907,456 \$	5,133,082 \$	27,030,724 \$	13,600,546 \$	67,870,340
Net Operating Income - Pro-Forma				1,550,548 \$	2,237,236 \$	615,194 \$	4,792,099 \$	1,532,501 \$	5,869,251
Net Cost Rate Base				22,620,354 \$	32,257,851 \$	9,710,208 \$	50,173,059 \$	26,606,267 \$	134,517,544
<b>Rate of Return</b>				<b>6.89%</b>	<b>6.94%</b>	<b>6.34%</b>	<b>9.55%</b>	<b>5.76%</b>	<b>4.36%</b>

BIP Prod Trans Allocation  
 Removes ECR Rate Base  
 Present Revenues reflect CSR Incr  
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LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LP-TOD Secondary	Street Lighting Rate PSL	Street Lighting Rate SLE	Street Lighting Rate OL	Street Lighting Rate TLE	Special Contracts
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				\$ 1,660,600	\$ 2,990,230	\$ 160,034	\$ 3,323,607	\$ 437,073	\$ 27,073,406
Depreciation and Amortization Expenses				277,050	1,363,409	29,200	1,730,013	64,211	3,857,568
Accretion Expense				1,484	2,013	160	2,088	355	23,571
Property and Other Taxes			NPT	36,758	169,343	3,883	213,859	8,544	516,157
Amortization of Investment Tax Credit				(11,696)	(53,865)	(1,235)	(68,050)	(2,719)	(164,879)
Other Expenses				(17,661)	(81,362)	(1,865)	(102,751)	(4,105)	(248,953)
State and Federal Income Taxes			TXINCPF	159,620	202,899	(3,453)	319,895	59,836	1,712,774
Specific Assignment of Interruptible Credit				-	-	-	-	-	(486,000)
Allocation of Interruptible Credits			SCP	12,085	-	-	-	1,678	159,682
<b>Adjustments to Operating Expenses:</b>									
Eliminate mismatch in fuel cost recovery				(7,490)	(8,992)	(698)	(9,342)	(2,007)	(128,357)
Remove ECR expenses			Energy	(6,339)	(15,470)	(474)	(19,117)	(1,746)	(85,491)
Eliminate brokered sales expenses			Energy	(93,494)	(112,246)	(8,719)	(116,606)	(25,054)	(1,602,194)
Eliminate DSM Expenses			DSMREV	-	-	-	-	-	-
Year end Expense adjustment			YREND	-	1,673	(647)	9,548	3,240	-
Adjustment to annualize depreciation expense			DET	25,904	127,476	2,730	161,753	6,004	380,676
Depreciation adjustment			DET	-	-	-	-	-	-
Labor adjustment			LBT	2,585	5,797	267	6,433	675	37,717
Adjustment for pension and post Ret Exp. (See Functional Assignment)			SDALL	164	487	15	508	27	896
Storm damage adjustment			OMT	1,103	1,963	105	2,162	287	17,773
Adjustment to eliminate advertising expense (See Functional Assignment)			R01	202	496	15	612	56	2,837
Amortization of ESM audit expenses				-	-	-	-	-	-
Remove one-utility cost (See Functional Assignment)				-	-	-	-	-	-
Adjustment for injuries and damages (See Functional Assignment)				-	-	-	-	-	-
Adjustment for VDT net savings to shareholders			LBT	15,871	35,591	1,639	39,498	4,142	231,578
Adjustment for merger savings			LBT	54,668	122,595	5,646	136,052	14,268	797,688
Adjustment for merger amortization expenses			LBT	(7,660)	(17,177)	(791)	(19,062)	(1,989)	(111,765)
MISO Schedule 10 one time credit			PLTRT	2,277	3,089	246	3,204	545	36,161
Adjustment cumulative effect of accounting change			DET	15,268	75,135	1,609	95,338	3,539	212,584
Adjustment for IT staff reduction			LBT	(1,215)	(2,725)	(125)	(3,024)	(317)	(17,731)
Remove Alston Expenses			PLPPT	(6,923)	(9,391)	(748)	(9,742)	(1,656)	(109,957)
Adjustment for Obsolete inventory write-off			PLT	(4,001)	(18,620)	(422)	(23,538)	(930)	(56,281)
Adjustment for corporate office lease			LBT	5,061	11,349	523	12,598	1,321	73,843
Adjustment for carbide lime write-off			Energy	(5,292)	(6,353)	(493)	(6,600)	(1,416)	(90,682)
Adjustment for Cane Run repair refund			PLPPT	11,512	15,617	1,244	16,200	2,754	182,851
VDT Amortization and Surcredit			VDTRV	(738)	(1,836)	(52)	(2,290)	(206)	(10,853)
Total Expense Adjustments				1,462	208,456	867	274,601	1,524	(258,718)
Total Operating Expenses			TOE	2,139,702	4,801,103	187,590	5,693,263	586,398	32,186,608
<b>Net Operating Income – Pro-Forma</b>				\$ 324,363	\$ 651,910	\$ 2,124	\$ 925,997	\$ 111,362	\$ 3,722,296
<b>Net Cost Rate Base</b>				\$ 4,292,210	\$ 20,157,813	\$ 451,450	\$ 25,495,128	\$ 1,001,069	\$ 60,367,542
<b>Rate of Return</b>				<b>7.56%</b>	<b>3.23%</b>	<b>0.47%</b>	<b>3.62%</b>	<b>11.12%</b>	<b>6.17%</b>

BIP Prod Trans Allocation  
 Removes ECR Rate Base  
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LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate R	Water Heating Rate WH	General Service Rate GS	Rate LC	
								Primary	Secondary
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue – Actual				\$ 768,525,765	\$ 291,603,270	\$ 1,158,990	\$ 107,524,685	\$ 8,982,068	\$ 132,709,052
Pro-Forma Adjustments:									
Eliminate unbilled revenue				(1,867,000)	(715,724)	(2,428)	(271,251)	(21,339)	(322,331)
Mismatch in fuel cost recovery				(4,406,145)	(1,479,166)	(6,661)	(513,321)	(58,331)	(791,604)
To Reflect a Full Year of the FAC Roll-In		FACRI	Energy	547,241	181,639	1,202	87,109	11,617	139,923
Remove ECR revenues		ECRREV		(11,228,428)	(4,284,952)	(15,362)	(1,630,456)	(127,642)	(1,940,152)
To Reflect a Full Year of the ECR Roll-In		ECRRI		723,260	255,297	937	110,897	9,089	133,401
Remove off-system ECR revenues				(1,928,923)	(792,562)	(7,045)	(258,546)	(22,434)	(320,785)
Eliminate brokered sales				(22,608,445)	(7,589,772)	(34,335)	(2,633,910)	(298,304)	(4,061,814)
Eliminate ESM revenues		ESMREV	PLPPT Energy	(6,874,760)	(2,763,963)	(7,154)	(1,008,115)	(80,480)	(1,196,285)
Eliminate Rate Refund Acct				(7,150,231)	(2,741,076)	(9,289)	(1,038,835)	(81,725)	(1,234,463)
Eliminate DSM Revenue		DSMREV	R01	(3,277,501)	(2,771,657)	-	(108,973)	(25,623)	(340,279)
Year End Revenue Adjustment		YREND		2,814,347	1,232,278	-	(279,531)	-	932,654
Adjustment for Merger savings				(2,758,795)	(1,057,598)	(3,568)	(400,817)	(31,532)	(476,286)
Adjustment for Customer Rate Switching & CSR Credit		RATESW	R01	(621,927)	17,356	57	6,447	505	7,617
VDT Amortization and Surcredit		VDTREV		44,485	-	-	-	-	-
Total Pro-Forma Operating Revenue				\$ 709,631,942	\$ 268,113,371	\$ 1,065,289	\$ 99,584,383	\$ 8,254,868	\$ 123,238,838

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LC-TOD		Rate LP Primary	Rate LP Secondary	Rate LP-TOD Transmission	Rate LP-TOD Primary
				Primary	Secondary				
<b>Cost of Service Summary -- Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue -- Actual				\$ 14,866,854	\$ 18,848,201	\$ 6,311,989	\$ 34,454,413	\$ 16,765,931	\$ 79,766,951
Pro-Forma Adjustments:									
Eliminate unbilled revenue				(34,588)	(45,400)	(14,766)	(83,346)	(37,178)	(183,683)
Mismatch in fuel cost recovery			R01 Energy	(98,406)	(118,786)	(42,016)	(212,910)	(138,932)	(601,261)
To Reflect a Full Year of the FAC Roll-In		FACRI		16,117	24,738	5,030	28,206	10,866	20,692
Remove ECR revenues		ECRREV		(207,809)	(275,776)	(89,065)	(505,167)	(223,730)	(1,130,564)
To Reflect a Full Year of the ECR Roll-In		ECRRI		14,884	21,249	5,484	35,195	16,754	67,122
Remove off-system ECR revenues			PLPPT Energy	(36,425)	(43,681)	(17,332)	(79,984)	(42,430)	(183,484)
Eliminate brokered sales		ESMREV		(504,933)	(609,504)	(215,588)	(1,092,466)	(712,877)	(3,085,143)
Eliminate ESM revenues			R01	(130,047)	(164,826)	(53,219)	(301,827)	(135,771)	(645,195)
Eliminate Rate Refund Acct		DSMREV		(132,468)	(173,873)	(56,551)	(319,207)	(142,363)	(703,468)
Eliminate DSM Revenue		YREND		(14,686)	(16,281)	-	-	-	-
Year End Revenue Adjustment			R01	(51,111)	(67,086)	(21,819)	(147,900)	(54,936)	(271,421)
Adjustment for Merger savings				-	-	-	(123,161)	(279,699)	(252,226)
Adjustment for Customer Rate Switching & CSR Credit		RATESW		815	1,070	349	1,955	867	4,284
VDT Amortization and Surcredit		VDTREV		-	-	-	-	-	-
Total Pro-Forma Operating Revenue				\$ 13,488,192	\$ 17,946,145	\$ 5,812,504	\$ 31,949,599	\$ 15,026,482	\$ 72,802,571

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LP-TOD Secondary	Street Lighting Rate PSL	Street Lighting Rate SLE	Street Lighting Rate OL	Street Lighting Rate TLE	Special Contracts
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue – Actual				\$ 2,756,699	\$ 5,846,370	\$ 211,367	\$ 7,056,532	\$ 715,799	\$ 39,146,605
Pro-Forma Adjustments:									
Eliminate unbilled revenue			R01	(6,454)	(15,880)	(464)	(19,577)	(1,786)	(90,792)
Mismatch in fuel cost recovery			Energy	(16,456)	(18,759)	(1,535)	(20,526)	(4,410)	(282,033)
To Reflect a Full Year of the FAC Roll-In		FACR		1,436	(3,891)	156	(1,432)	797	23,036
Remove ECR revenues		ECRREV		(40,296)	(88,342)	(3,010)	(121,526)	(11,087)	(543,453)
To Reflect a Full Year of the ECR Roll-In		ECRRI		3,088	6,611	212	9,072	811	33,157
Remove off-system ECR revenues			PLPPT	(9,329)	(6,899)	(790)	(9,385)	(1,069)	(95,761)
Eliminate brokered sales			Energy	(84,446)	(101,383)	(7,875)	(105,321)	(22,630)	(1,447,143)
Eliminate ESM revenues		ESMREV		(20,232)	(57,193)	(1,416)	(65,875)	(6,308)	(335,874)
Eliminate Rate Refund Acct		DSMREV	R01	(24,719)	(60,854)	(1,778)	(74,374)	(6,841)	(347,716)
Eliminate DSM Revenue		YREND		-	2,999	-	17,114	5,808	-
Year End Revenue Adjustment			R01	(9,537)	(23,479)	(686)	(28,928)	(2,639)	(134,160)
Adjustment for Merger savings		RATESW		146	364	10	453	-	(90,000)
Adjustment for Customer Rate Switching & CSR Credit				-	-	-	-	-	2,148
VDT Amortization and Surcredit			VDTREV	-	-	-	-	-	-
Total Pro-Forma Operating Revenue				\$ 2,549,898	\$ 5,466,655	\$ 193,033	\$ 6,635,628	\$ 666,475	\$ 35,838,013

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate R	Water Heating Rate WH	General Service Rate GS	Rate LC	
								Primary	Secondary
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				\$ 508,149,420	\$ 204,145,564	\$ 1,503,840	\$ 63,483,421	\$ 5,864,100	\$ 81,976,232
Depreciation and Amortization Expenses				95,827,965	44,314,049	490,604	12,810,179	913,101	13,614,930
Accretion Expense				462,519	189,943	1,688	61,962	5,376	76,878
Property and Other Taxes			NPT	12,603,252	5,775,882	63,041	1,655,060	122,207	1,815,007
Amortization of Investment Tax Credit				(4,010,380)	(1,637,901)	(20,060)	(536,196)	(38,887)	(577,539)
Other Expenses				(6,055,342)	(2,775,078)	(30,288)	(809,611)	(58,715)	(872,036)
State and Federal Income Taxes			TXINCPF	27,184,243	62,557	(466,405)	6,799,629	465,558	8,756,882
Specific Assignment of Interruptible Credit			SCP1	(3,519,894)	1,511,175	2,563	514,921	41,545	625,034
Allocation of Interruptible Credits				3,519,894	1,511,175	2,563	514,921	41,545	625,034
<b>Adjustments to Operating Expenses:</b>									
Eliminate mismatch in fuel cost recovery			Energy	(2,005,300)	(673,190)	(3,045)	(233,620)	(26,547)	(360,271)
Remove ECR expenses			ECRREV	(1,766,344)	(670,920)	(2,417)	(256,487)	(20,079)	(305,205)
Eliminate brokered sales expenses			Energy	(25,030,766)	(8,402,958)	(38,013)	(2,916,114)	(331,372)	(4,497,006)
Eliminate DSM Expenses			DSMREV	(3,280,013)	(2,773,781)	-	(109,057)	(25,643)	(340,540)
Year end Expense adjustment			YREND	1,458,544	687,488	(5,575)	(155,950)	-	520,400
Adjustment to annualize depreciation expense			DET	8,959,741	4,143,263	45,871	1,197,729	85,373	1,272,971
Depreciation adjustment			DET	-	-	-	-	-	-
Labor adjustment			LBT	918,580	436,409	4,136	124,822	8,879	128,541
Adjustment for pension and post Ret Exp. (See Functional Assignment)			SDALL	70,492	46,793	694	9,491	283	5,995
Storm damage adjustment			OMT	333,580	134,013	987	41,661	3,850	53,814
Adjustment to eliminate advertising expense (See Functional Assignment)			RO1	58,333	22,362	76	8,475	667	10,071
Amortization of rate case expenses									
Amortization of ESM audit expenses									
Remove one-utility cost (See Functional Assignment)									
Adjustment for injuries and damages (See Functional Assignment)			LBT	5,640,000	2,679,514	25,394	766,396	54,517	769,231
Adjustment for VDT net savings to shareholders			LBT	19,427,401	9,229,788	87,471	2,639,907	187,768	2,718,566
Adjustment for merger savings			LBT	(2,722,005)	(1,283,201)	(12,256)	(369,882)	(26,311)	(360,903)
Adjustment for merger amortization expenses			PLTRT	709,577	281,402	2,590	95,060	8,248	117,944
MISO Schedule 10 one time credit			DET	5,280,909	2,442,069	27,036	705,946	50,319	750,295
Adjustment cumulative effect of accounting change			LBT	(431,834)	(205,161)	(1,944)	(58,680)	(4,174)	(60,429)
Remove Alstom Expenses			PUPPT	(2,157,640)	(886,078)	(7,877)	(289,053)	(25,081)	(358,636)
Adjustment for Obsolete inventory write-off			PLT	(1,373,632)	(630,542)	(6,960)	(183,550)	(13,283)	(197,410)
Adjustment for corporate office lease			LBT	1,798,420	854,414	8,097	244,360	17,384	251,661
Adjustment for carbide lime write-off			Energy	(1,416,711)	(475,597)	(2,152)	(165,048)	(18,795)	(254,525)
Adjustment for Cane Run repair refund			PUPPT	3,986,000	1,473,485	13,099	480,674	41,708	596,385
Adjustment for VDT Amortization and Surcredit			VDTRV	(224,718)	(87,676)	(296)	(32,570)	(2,549)	(38,480)
Total Expense Adjustments				7,834,614	6,341,917	135,026	1,544,530	(34,780)	422,510
Total Operating Expenses		TOE		\$ 641,986,290	\$ 257,728,118	\$ 1,660,010	\$ 85,533,915	\$ 7,279,507	\$ 105,837,997
Net Operating Income – Pro-Forma				\$ 67,635,652	\$ 11,385,253	\$ (614,721)	\$ 14,050,468	\$ 975,361	\$ 17,400,941
Net Cost Rate Base				\$ 1,473,843,556	\$ 676,820,462	\$ 7,339,572	\$ 196,498,956	\$ 14,222,061	\$ 211,257,595
<b>Rate of Return</b>				<b>4.59%</b>	<b>1.68%</b>	<b>-0.38%</b>	<b>7.15%</b>	<b>1.00%</b>	<b>8.24%</b>

Average and Excess Prof Trans Allocation  
All Other KUUC Corrections Included

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LC-TOD Primary	Rate LC-TOD Secondary	Rate LP Primary	Rate LP Secondary	Rate LP-TOD Transmission	Rate LP-TOD Primary
<b>Cost of Service Summary -- Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				\$	11,728,441	4,342,362	21,322,155	12,620,140	55,734,309
Depreciation and Amortization Expenses				1,468,922	1,814,501	706,038	3,393,056	1,547,527	7,379,861
Accretion Expense				8,729	10,464	4,154	19,169	10,169	43,973
Property and Other Taxes			NPT	196,772	242,367	94,728	452,349	209,424	988,835
Amortization of Investment Tax Credit				(62,613)	(77,122)	(30,143)	(143,938)	(65,639)	(314,648)
Other Expenses				(94,541)	(116,447)	(45,513)	(217,335)	(100,619)	(475,095)
State and Federal Income Taxes			TXINCPF	740,596	1,370,270	197,818	2,346,968	855,773	3,663,837
Specific Assignment of Interruptible Credit								(1,637,062)	(1,396,833)
Allocation of Interruptible Credits			SCP1	66,076	84,505	29,945	140,138	60,511	270,035
<b>Adjustments to Operating Expenses:</b>									
Eliminate mismatch in fuel cost recovery			Energy	(44,786)	(54,061)	(19,122)	(96,888)	(63,230)	(273,643)
Remove ECR expenses			ECRREV	(32,690)	(43,382)	(14,011)	(79,468)	(35,195)	(177,854)
Eliminate brokered sales expenses			Energy	(559,033)	(674,807)	(238,687)	(1,208,515)	(789,257)	(3,415,692)
Eliminate DSM Expenses			DSMREV	(14,699)	(16,293)	-	-	-	-
Year end Expense adjustment			YREND	315,814	-	-	82,513	-	-
Adjustment to annualize depreciation expense			DET	137,342	169,653	66,200	317,245	144,691	690,004
Depreciation adjustment			DET	-	-	-	-	-	-
Labor adjustment			LBT	14,076	17,246	6,805	32,067	16,301	75,488
Adjustment for pension and post Ret Exp (See Functional Assignment)			SDALL	454	719	221	1,509	-	2,235
Storm damage adjustment			OMT	6,350	7,699	2,851	13,997	8,265	36,587
Adjustment to eliminate advertising expense (See Functional Assignment)			RO1	1,081	1,418	461	2,604	1,162	5,739
Amortization of rate case expenses									
Amortization of ESM audit expenses									
Remove one-utility cost (See Functional Assignment)									
Adjustment for injuries and damages to shareholders			LBT	86,427	105,892	41,760	196,869	100,090	463,554
Adjustment for merger savings			LBT	297,703	364,752	143,915	678,198	344,768	1,586,745
Adjustment for merger amortization expenses			LBT	(41,712)	(51,106)	(20,164)	(95,024)	(48,306)	(223,723)
MISO Schedule 10 one time credit			PLTRT	13,392	16,053	6,373	29,408	15,600	67,462
Adjustment cumulative effect of accounting change			DET	80,950	99,984	39,019	186,985	85,281	406,891
Adjustment for IT staff reduction			LBT	(6,617)	(8,108)	(3,169)	(15,075)	(7,663)	(35,493)
Remove Alstom Expenses			PLPPT	(40,723)	(48,812)	(19,377)	(89,422)	(47,436)	(205,134)
Adjustment for obsolete inventory write-off			PLT	(21,386)	(26,353)	(10,297)	(48,198)	(22,725)	(107,465)
Adjustment for corporate office lease			LBT	27,559	33,766	13,322	62,782	31,915	147,813
Adjustment for carbide lime write-off			Energy	(31,641)	(38,193)	(13,509)	(68,457)	(44,671)	(193,324)
Adjustment for Cane Run repair refund			PLPPT	67,719	81,171	32,223	148,702	76,883	341,123
VDT Amortization and Surcredit			VDTREV	(4,118)	(5,457)	(1,762)	(9,674)	(4,381)	(21,640)
Total Expense Adjustments				(64,351)	247,654	13,042	39,968	(235,890)	(820,517)
Total Operating Expenses		TOE		\$	15,304,633	5,314,432	27,352,530	13,263,334	65,073,757
<b>Net Operating Income -- Pro-Forma</b>				\$	1,556,204	488,073	4,597,069	1,763,148	7,728,814
<b>Net Cost Rate Base</b>				\$	22,907,580	11,006,955	52,732,604	24,454,785	115,801,430
<b>Rate of Return</b>					<b>6.79%</b>	<b>4.53%</b>	<b>8.72%</b>	<b>7.21%</b>	<b>6.67%</b>

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LP-TOD Secondary	Street Lighting Rate PSL	Street Lighting Rate SLE	Street Lighting Rate OL	Street Lighting Rate TLE	Special Contracts
<b>Cost of Service Summary - Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				1,914,697 \$	3,075,140 \$	173,208 \$	3,423,529 \$	405,660 \$	26,784,204
Depreciation and Amortization Expenses				390,982	1,381,515	33,605	1,754,394	49,231	3,763,469
Accretion Expense				2,236	2,133	189	2,249	256	22,960
Property and Other Taxes			NPT	52,183	171,794	4,479	217,160	6,515	505,418
Amortization of Investment Tax Credit				(16,605)	(54,665)	(1,425)	(69,101)	(2,073)	(160,825)
Other Expenses				(25,072)	(82,540)	(2,152)	(104,336)	(3,130)	(242,832)
State and Federal Income Taxes			TXINCPF	30,150 \$	163,835 \$	(10,057) \$	272,880 \$	77,097 \$	1,856,854
Specific Assignment or Interruptible Credit									(486,000)
Allocation of Interruptible Credits			SCP1	12,085 \$				1,678 \$	159,682
<b>Adjustments to Operating Expenses:</b>									
Eliminate mismatch in fuel cost recovery			Energy	(7,490) \$	(6,992) \$	(698) \$	(9,342) \$	(2,007) \$	(128,357)
Remove ECR expenses			ECRREV	(6,339) \$	(15,470) \$	(474) \$	(19,117) \$	(1,746) \$	(85,491)
Eliminate brokered sales expenses			Energy	(93,494) \$	(112,246) \$	(6,719) \$	(116,606) \$	(25,054) \$	(1,602,194)
Eliminate DSM Expenses			DSMREV						
Year end Expense adjustment			YREND		1,673	(647)	9,548	3,240	
Adjustment to annualize depreciation expense			DET	36,556	129,169	3,142	164,033	4,603	351,878
Depreciation adjustment			DET						
Labor adjustment			LBT						
Adjustment for pension and post Ret Exp. (See Functional Assignment)				3,302 \$	5,911 \$	295 \$	6,566 \$	580 \$	37,125
Storm damage adjustment			SDALL	164 \$	487 \$	15 \$	508 \$	27 \$	886
Adjustment to eliminate advertising expense (See Functional Assignment)			OMT	1,257 \$	2,019 \$	114 \$	2,247 \$	266 \$	17,563
Amortization of rate case expenses			R01	202 \$	486 \$	15 \$	612 \$	56 \$	2,637
Remove one-time cost (See Functional Assignment)									
Adjustment for injuries and damages (See Functional Assignment)									
Adjustment for VDT net savings to shareholders			LBT	20,272 \$	36,290 \$	1,809 \$	40,439 \$	3,564 \$	227,943
Adjustment for merger savings			LBT	69,828	125,004	6,232	139,296	12,275	765,167
Adjustment for merger amortization expenses			LBT	(9,784)	(17,515)	(673)	(19,517)	(1,720)	(110,011)
MISO Schedule 10 one time credit			PLTRT	3,430	3,272	291	3,451	393	35,209
Adjustment cumulative effect of accounting change			DET	21,546	76,133	1,852	96,662	2,713	207,398
Adjustment for IT staff reduction			LBT	(1,552)	(2,779)	(139)	(3,096)	(273)	(17,453)
Remove Alstom Expenses			PLPPT	(10,430)	(9,949)	(884)	(10,492)	(1,195)	(107,061)
Adjustment for obsolete inventory write-off			PLT	(5,675)	(18,866)	(487)	(23,995)	(710)	(54,909)
Adjustment for corporate office lease			LBT	6,464	11,572	577	12,985	1,136	72,664
Adjustment for carbide lime write-off			Energy	(5,292)	(6,353)	(493)	(6,900)	(1,416)	(90,662)
Adjustment for Cane Run repair refund			PLPPT	17,344	16,944	1,469	17,448	1,987	178,034
VDT Amortization and Surcredit			VDTREV	(738) \$	(1,856) \$	(52) \$	(2,290) \$	(206) \$	(10,853)
Total Expense Adjustments				39,572	214,544	2,344	282,789	(3,487)	(290,257)
Total Operating Expenses			TOE	2,400,229 \$	4,871,757 \$	200,191 \$	5,776,564 \$	531,768 \$	31,912,662
Net Operating Income - Pro-Forma				149,669 \$	594,897 \$	(7,159) \$	856,064 \$	134,707 \$	3,925,351
Net Cost Rate Base				6,025,129 \$	20,433,213 \$	518,452 \$	25,865,966 \$	773,242 \$	58,936,288
<b>Rate of Return</b>				<b>2.48%</b>	<b>2.91%</b>	<b>-1.38%</b>	<b>3.31%</b>	<b>17.42%</b>	<b>6.65%</b>

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>LOUISVILLE GAS AND ELECTRIC COMPANY</b>	)	<b>2003-00433</b>
	)	
<b>AND</b>	)	
	)	
<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>KENTUCKY UTILITIES COMPANY</b>	)	<b>2003-00434</b>

**EXHIBIT (SJB-9)**

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate R	Water Heating Rate WH	General Service Rate GS	Rate LC	
								Primary	Secondary
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue – Actual				\$ 768,525,785	\$ 293,491,954	\$ 1,027,478	\$ 106,759,166	\$ 8,907,770	\$ 132,960,127
Pro-Forma Adjustments:									
Eliminate unbilled revenue				\$ (1,867,000)	\$ (715,724)	\$ (2,428)	\$ (271,251)	\$ (21,339)	\$ (322,331)
Mismatch in fuel cost recovery				(4,406,145)	(1,479,166)	(6,691)	(513,321)	(96,331)	(791,604)
To Reflect a Full Year of the FAC Roll-in		FACRI	Energy	547,241	181,639	1,202	87,108	11,617	139,923
Remove ECR revenues		ECRREV		(11,228,429)	(4,254,952)	(15,362)	(1,630,456)	(127,642)	(1,940,152)
To Reflect a Full Year of the ECR Roll-in		ECRRI		723,260	255,297	937	110,897	9,089	133,401
Remove off-system ECR revenues				(1,929,923)	(859,156)	(2,408)	(231,554)	(19,814)	(329,638)
Eliminate brokered sales		PLPPT	Energy	(22,608,445)	(7,589,772)	(34,335)	(2,693,910)	(289,304)	(4,061,814)
Eliminate ESM revenues		ESMREV		(6,374,780)	(2,763,963)	(7,154)	(1,009,115)	(80,480)	(1,196,285)
Eliminate Rate Refund Acct		R01		(7,150,231)	(2,741,076)	(9,299)	(1,038,835)	(81,725)	(1,234,463)
Eliminate DSM Revenue		DSMREV		(3,277,501)	(2,771,657)	-	(108,973)	(25,623)	(340,278)
Year End Revenue Adjustment		YREND		2,614,347	1,232,278	(9,893)	(279,531)	-	932,854
Adjustment for Merger savings		RATESW		(2,758,795)	(1,057,598)	(3,588)	(400,817)	(31,532)	(476,296)
Adjustment for Customer Rate Switching & CSR Credit				(521,927)		-			
VDT Amortization and Surrealt		VDTREV		44,465	17,356	57	6,447	505	7,617
Total Pro-Forma Operating Revenue				\$ 709,631,942	\$ 270,935,461	\$ 938,413	\$ 98,845,856	\$ 8,183,190	\$ 123,481,059

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LC-TOD Primary	Rate LC-TOD Secondary	Rate LP Primary	Rate LP Secondary	Rate LP-TOD Transmission	Rate LP-TOD Primary
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue – Actual				\$ 14,586,905	\$ 18,995,493	\$ 6,226,733	\$ 34,167,324	\$ 16,612,432	\$ 79,626,726
Pro-Forma Adjustments:									
Eliminate unbilled revenue				(34,589)	(45,400)	(14,766)	(63,348)	(37,178)	(183,663)
Mismatch in fuel cost recovery			R01 Energy	(98,406)	(118,786)	(42,016)	(212,910)	(138,932)	(601,261)
To Reflect a Full Year of the FAC Roll-In		FACRI		16,117	24,738	5,030	28,206	10,866	20,692
Remove ECR revenues		ECRREV		(207,809)	(275,776)	(89,065)	(505,167)	(223,730)	(1,130,594)
To Reflect a Full Year of the ECR Roll-In		ECRRI		14,884	21,249	5,484	35,195	16,754	67,122
Remove cfi-system ECR revenues			PLPPT Energy	(33,806)	(48,995)	(14,326)	(69,862)	(37,018)	(178,540)
Eliminate brokered sales				(504,933)	(699,504)	(215,568)	(1,092,466)	(712,877)	(3,085,143)
Eliminate ESM revenues		ESMREV		(130,047)	(164,826)	(53,219)	(301,627)	(135,771)	(645,195)
Eliminate Rate Refund Acct			R01	(132,469)	(173,873)	(56,551)	(319,207)	(142,383)	(703,468)
Eliminate DSM Revenue		DSMREV		(14,688)	(16,281)	-	-	-	-
Year End Revenue Adjustment		YREND		-	566,077	-	147,900	-	-
Adjustment for Merger savings			R01	(51,111)	(67,096)	(21,819)	(123,161)	(54,936)	(271,421)
Adjustment for Customer Rate Switching & CSR Credit		RATESW		-	-	-	-	(279,699)	(252,228)
VDT Amortization and Surcredit			VDTREV	815	1,070	349	1,955	887	4,284
Total Pro-Forma Operating Revenue				\$ 13,411,062	\$ 18,092,102	\$ 5,730,245	\$ 31,672,532	\$ 14,878,396	\$ 72,667,290

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LP-TOD Secondary	Street Lighting Rate PSL	Street Lighting Rate SLE	Street Lighting Rate OL	Street Lighting Rate TLE	Special Contracts
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue – Actual				\$ 2,662,246	\$ 5,749,261	\$ 201,481	\$ 6,951,301	\$ 717,841	\$ 38,877,550
Pro-Forma Adjustments:									
Eliminate unbilled revenue			R01 Energy	(5,454)	(15,880)	(484)	(19,577)	(1,786)	(90,792)
Mismatch in fuel cost recovery		FACRI		(16,458)	(19,759)	(1,535)	(20,526)	(4,410)	(282,033)
To Reflect a Full Year of the FAC Roll-In		ECRREV		1,436	(3,891)	156	(1,432)	797	23,036
Remove ECR revenues		ECRRI		(40,296)	(98,342)	(3,010)	(121,526)	(11,097)	(543,453)
To Reflect a Full Year of the ECR Roll-In			PLPPT Energy	3,088	6,611	212	9,072	811	33,157
Remove off-system ECR revenues				(5,999)	(5,475)	(442)	(5,675)	(1,141)	(66,275)
Eliminate brokered sales		ESMREV		(84,446)	(101,363)	(7,875)	(105,821)	(22,630)	(1,447,143)
Eliminate ESM revenues			R01	(20,232)	(57,193)	(1,416)	(65,875)	(6,308)	(335,874)
Eliminate Rate Refund Acct		DSMREV		(24,719)	(60,854)	(1,778)	(74,974)	(6,841)	(347,716)
Eliminate DSM Revenue		YREND		-	2,999	(1,159)	17,114	5,608	-
Year End Revenue Adjustment			R01	(9,537)	(23,479)	(686)	(28,928)	(2,639)	(134,160)
Adjustment for Merger savings		RATESW		146	364	10	453	-	(90,000)
Adjustment for Customer Rate Switching & CSR Credit			VDTREV	-	-	-	-	41	2,148
VDT Amortization and Surcredit				-	-	-	-	-	-
Total Pro-Forma Operating Revenue				\$ 2,458,774	\$ 5,372,969	\$ 183,495	\$ 6,534,107	\$ 668,445	\$ 35,578,445

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate R	Water Heating Rate WH	General Service Rate GS	Rate LC Primary	Rate LC Secondary
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				\$ 508,149,420	\$ 208,035,041	\$ 1,148,292	\$ 61,335,571	\$ 5,695,715	\$ 82,763,009
Depreciation and Amortization Expenses				95,827,965	46,732,644	322,191	11,829,877	817,957	13,936,448
Accretion Expense				462,519	205,902	577	55,493	4,749	79,000
Property and Other Taxes			NPT	12,693,252	6,103,343	40,239	1,552,358	109,326	1,856,537
Amortization of Investment Tax Credit				(4,010,380)	(1,842,096)	(12,804)	(493,964)	(34,788)	(591,390)
Other Expenses				(6,055,342)	(2,932,404)	(19,333)	(745,844)	(52,526)	(892,950)
State and Federal Income Taxes			TXINCPF	27,184,243	(2,267,328)	(271,339)	7,957,650	563,172	8,342,628
Specific Assignment of Interruptible Credit				(3,519,894)	-	-	-	-	-
Allocation of Interruptible Credits			SCP	3,519,894	1,511,175	2,563	514,921	41,545	625,034
<b>Adjustments to Operating Expenses:</b>									
Eliminate mismatch in fuel cost recovery			Energy	(2,005,300)	(673,190)	(3,045)	(233,620)	(26,547)	(360,271)
Remove ECR expenses			ECRREV	(1,766,344)	(670,920)	(2,417)	(256,487)	(20,079)	(305,205)
Eliminate brokered sales expenses			Energy	(25,030,766)	(8,402,958)	(38,013)	(2,916,114)	(331,372)	(4,497,006)
Eliminate DSM Expenses			DSMREV	(3,280,013)	(2,773,781)	-	(109,057)	(25,643)	(340,540)
Year end expense adjustment			YREND	1,458,544	687,488	(5,575)	(155,950)	-	(340,540)
Adjustment to annualize depreciation expense			DET	8,959,741	4,369,417	30,124	1,106,072	76,478	520,439
Depreciation adjustment			DET	-	-	-	-	-	1,303,093
Labor adjustment			LBT	918,580	451,626	3,076	118,654	8,281	130,564
Adjustment for pension and post Ret Exp. (See Functional Assignment)			SDALL	70,492	46,793	684	9,491	283	5,995
Storm damage adjustment			OMT	333,590	136,567	754	40,264	3,739	54,331
Adjustment to eliminate advertising expense (See Functional Assignment)			RO1	58,333	22,362	76	8,475	667	10,071
Amortization of rate case expenses									
Amortization of ESM audit expenses									
Remove one-utility cost (See Functional Assignment)									
Adjustment for injuries and damages (See Functional Assignment)									
Adjustment for VDT net savings to shareholders			LBT	5,640,000	2,772,944	18,888	728,527	50,842	801,652
Adjustment for merger savings			LBT	19,427,401	9,551,612	65,062	2,509,465	175,128	2,761,348
Adjustment for merger amortization expenses			LBT	(2,722,005)	(1,338,292)	(9,116)	(351,605)	(24,537)	(386,987)
MISO Schedule 10 one time credit			PLTRT	709,577	315,887	885	85,136	7,285	121,198
Adjustment cumulative effect of accounting change			DET	5,280,909	2,575,353	17,755	651,924	45,076	768,013
Adjustment for IT staff reduction			LBT	(431,834)	(212,314)	(1,446)	(55,781)	(3,893)	(61,379)
Remove Alision Expenses			PLPPT	(2,157,840)	(960,530)	(2,693)	(258,876)	(22,152)	(368,533)
Adjustment for Obsolete inventory write-off			PLT	(1,373,632)	(666,073)	(4,386)	(169,149)	(11,886)	(202,133)
Adjustment for corporate office lease			LBT	1,798,420	884,205	6,023	232,304	16,212	255,622
Adjustment for carbide lime write-off			Energy	(1,416,711)	(475,597)	(2,152)	(165,048)	(18,795)	(254,525)
Adjustment for Cane Run repair refund			PLPPT	3,986,000	1,597,293	4,478	430,482	36,838	612,844
VDT Amortization and Surcredit			VDTREV	(224,718)	(87,676)	(236)	(32,570)	(2,549)	(38,480)
Total Operating Expenses		TOE		7,834,614	7,150,217	78,687	1,216,549	(66,567)	530,139
Total Operating Expenses				\$ 641,996,290	\$ 262,596,495	\$ 1,289,073	\$ 83,222,612	\$ 7,078,563	\$ 106,650,455
<b>Net Operating Income – Pro-Forma</b>				\$ 67,635,632	\$ 8,338,967	\$ (350,660)	\$ 15,623,243	\$ 1,104,627	\$ 16,830,605
<b>Net Cost Rate Base</b>				\$ 1,473,843,556	\$ 713,607,594	\$ 4,777,998	\$ 181,566,447	\$ 12,774,917	\$ 216,147,929
<b>Rate of Return</b>				<b>4.59%</b>	<b>1.17%</b>	<b>-7.34%</b>	<b>8.60%</b>	<b>1.00%</b>	<b>7.79%</b>

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LC-TOD Primary	Rate LC-TOD Secondary	Rate LP Primary	Rate LP Secondary	Rate LP-TOD Transmission	Rate LP-TOD Primary
<b>Cost of Service Summary -- Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				\$ 9,511,059	\$ 12,159,165	\$ 4,134,166	\$ 20,678,871	\$ 12,343,625	\$ 55,858,289
Depreciation and Amortization Expenses				1,366,543	2,008,241	598,849	3,025,418	1,350,961	7,200,293
Accretion Expense				8,054	11,742	3,433	16,743	8,872	42,788
Property and Other Taxes			NPT	182,911	268,587	79,946	402,575	182,611	964,524
Amortization of Investment Tax Credit				(56,203)	(85,468)	(25,439)	(128,100)	(56,171)	(306,913)
Other Expenses				(87,881)	(128,050)	(38,411)	(193,421)	(87,833)	(463,414)
State and Federal Income Taxes			TXINCPF	837,940	1,137,458	315,637	2,721,299	1,029,708	3,676,863
Specific Assignment of Interruptible Credit				-	-	-	-	(1,637,062)	(1,396,833)
Allocation of Interruptible Credits			SCP	66,076	84,505	29,945	140,138	60,511	270,035
<b>Adjustments to Operating Expenses:</b>									
Eliminate mismatch in fuel cost recovery			Energy	(44,786)	(54,061)	(19,122)	(96,898)	(63,230)	(273,643)
Remove ECR expenses			ECRREV	(32,690)	(43,382)	(14,011)	(79,468)	(35,195)	(177,854)
Eliminate brokered sales expenses			Energy	(559,035)	(674,807)	(238,667)	(1,208,515)	(789,257)	(3,415,692)
Eliminate DSM Expenses			DSMREV	-	-	-	-	-	-
Year end Expense adjustment			YREND	-	-	-	82,513	-	-
Adjustment to annualize depreciation expense			DET	127,769	187,767	55,991	262,871	126,312	673,214
Depreciation adjustment			DET	-	-	-	-	-	-
Labor adjustment			LBT	13,432	18,465	6,118	29,754	15,065	74,369
Adjustment for pension and post Ret Exp. (See Functional Assignment)			SDALL	454	719	221	1,509	-	2,235
Storm damage adjustment			OMT	6,244	7,982	2,714	13,575	8,103	36,669
Adjustment to eliminate advertising expense (See Functional Assignment)			RO1	1,081	1,418	461	2,504	1,162	5,739
Amortization of rate case expenses				-	-	-	-	-	-
Amortization of ESM audit expenses				-	-	-	-	-	-
Remove one-utility cost (See Functional Assignment)				-	-	-	-	-	-
Adjustment for injuries and damages (See Functional Assignment)			LBT	82,472	113,376	37,562	182,687	92,496	456,617
Adjustment for VDT net savings to shareholders			LBT	284,080	390,532	129,386	629,280	316,611	1,572,851
Adjustment for merger savings			LBT	(39,803)	(54,718)	(18,128)	(88,169)	(44,641)	(220,375)
Adjustment for merger amortization expenses			PLTRT	12,356	18,014	5,267	25,686	13,610	65,844
MISO Schedule 10 one time credit			DET	75,308	110,671	33,002	166,725	74,448	396,795
Adjustment cumulative effect of accounting change			LBT	(6,315)	(8,681)	(2,876)	(13,988)	(7,062)	(34,961)
Remove Alstom Expenses			PLPPT	(37,571)	(54,776)	(16,016)	(78,105)	(41,386)	(199,606)
Adjustment for obsolete inventory write-off			PLT	(19,882)	(29,199)	(8,693)	(43,798)	(19,838)	(104,827)
Adjustment for corporate office lease			LBT	26,298	36,152	11,977	58,253	29,484	145,601
Adjustment for carbide lime write-off			Energy	(31,641)	(38,193)	(13,509)	(66,457)	(44,671)	(193,324)
Adjustment for Cane Run repair refund			PLPPT	62,479	91,089	26,634	129,883	66,821	331,931
VDT Amortization and Surcredit			VDTRV	(4,116)	(5,407)	(1,762)	(9,574)	(4,381)	(21,640)
Total Expense Adjustments				(96,565)	312,480	(23,471)	(82,931)	(301,556)	(880,258)
Total Operating Expenses			TOE	\$ 11,727,934	\$ 15,767,670	\$ 5,074,656	\$ 26,590,591	\$ 12,892,066	\$ 64,965,374
Net Operating Income -- Pro-Forma				\$ 1,683,128	\$ 2,324,432	\$ 655,569	\$ 5,092,041	\$ 1,986,330	\$ 7,701,916
Net Cost Rate Base				\$ 21,350,378	\$ 31,196,075	\$ 9,346,178	\$ 47,140,776	\$ 21,464,989	\$ 113,070,176
<b>Rate of Return</b>				<b>7.88%</b>	<b>7.45%</b>	<b>7.01%</b>	<b>10.80%</b>	<b>9.25%</b>	<b>6.81%</b>

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LP-TOD Secondary	Street Lighting Rate PSL	Street Lighting Rate SLE	Street Lighting Rate OL	Street Lighting Rate TLE	Special Contracts
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				\$	2,829,284 \$	147,622 \$	3,156,338 \$	415,971 \$	26,272,879
Depreciation and Amortization Expenses				270,027	1,257,190	20,945	1,619,639	51,847	3,418,925
Accretion Expense				1,438	1,312	106	1,360	273	20,676
Property and Other Taxes			NPT	35,807	154,958	2,765	198,916	8,870	458,770
Amortization of Investment Tax Credit				(11,394)	(49,308)	(860)	(63,295)	(2,186)	(145,962)
Other Expenses				(17,204)	(74,451)	(1,329)	(95,571)	(3,301)	(220,420)
State and Federal Income Taxes			TXINCPF	168,316	301,407	4,164	422,257	72,220	2,172,191
Specific Assignment of Interruptible Credit				-	-	-	-	-	(486,000)
Allocation of Interruptible Credits			SCP	12,085	-	-	-	1,678	159,682
Adjustments to Operating Expenses:									
Eliminate mismatch in fuel cost recovery			Energy	(7,490)	(8,992)	(698)	(9,342)	(2,007)	(128,357)
Remove ECR expenses			ECORREV	(6,339)	(15,470)	(474)	(19,117)	(1,746)	(85,481)
Eliminate brokered sales expenses			Energy	(93,494)	(112,246)	(8,719)	(116,606)	(25,054)	(1,602,194)
Eliminate DSM Expenses			DSMREV	-	-	-	-	-	-
Year and Expense adjustment			YREND	-	1,673	(647)	9,548	3,240	-
Adjustment to annualize depreciation expense			DET	25,247	117,542	1,958	151,433	4,848	319,663
Depreciation adjustment			DET	-	-	-	-	-	-
Labor adjustment			LBT	2,541	5,128	215	5,738	587	34,957
Adjustment for pension and post Ret Exp. (See Functional Assignment)			SDALL	164	487	15	508	27	896
Storm damage adjustment			OMT	1,083	1,857	97	2,072	273	17,247
Adjustment to eliminate advertising expense (See Functional Assignment)			RO1	202	496	15	612	56	2,837
Amortization of rate case expenses									
Amortization of ESM audit expenses									
Remove one-utility cost (See Functional Assignment)									
Adjustment for injuries and damages (See Functional Assignment)									
Adjustment for VDT net savings to shareholders			LBT	15,600	31,486	1,320	35,234	3,665	214,633
Adjustment for merger savings			LBT	53,734	108,457	4,547	121,365	12,623	739,321
Adjustment for merger amortization expenses			LBT	(7,529)	(15,196)	(637)	(17,005)	(1,769)	(103,587)
MISO Schedule 10 one time credit			PLTRT	2,206	2,013	162	2,086	420	31,721
Adjustment cumulative effect of accounting change			DET	14,881	69,280	1,154	89,255	2,857	188,411
Adjustment for IT staff reduction			LBT	(1,194)	(2,411)	(101)	(2,698)	(281)	(16,434)
Remove Alstom Expenses			PUPPT	(6,706)	(6,121)	(494)	(6,344)	(1,276)	(96,454)
Adjustment for obsolete inventory write-off			PLT	(3,898)	(17,059)	(301)	(21,916)	(748)	(49,847)
Adjustment for corporate office lease			LBT	4,974	10,040	421	11,235	1,169	68,440
Adjustment for carbide line write-off			Energy	(5,292)	(6,353)	(493)	(6,800)	(1,418)	(80,682)
Adjustment for Carc Run repair refund			PUPPT	11,152	10,178	621	10,550	2,121	160,387
VDT Amortization and Surcredit			VDTRV	(738)	(1,636)	(52)	(2,290)	(209)	(10,853)
Total Expense Adjustments				(888)	172,954	(1,891)	237,721	(2,609)	(405,376)
Total Operating Expenses		TOE		\$ 2,122,511	\$ 4,593,316	\$ 171,503	\$ 5,477,363	\$ 540,763	\$ 31,245,346
Net Operating Income – Pro-Forma				\$ 336,263	\$ 779,653	\$ 11,992	\$ 1,056,745	\$ 127,683	\$ 4,333,089
Net Cost Rate Base				\$ 4,185,391	\$ 18,541,750	\$ 325,889	\$ 23,816,316	\$ 813,020	\$ 53,695,734
<b>Rate of Return</b>				<b>8.03%</b>	<b>4.20%</b>	<b>3.66%</b>	<b>4.44%</b>	<b>15.70%</b>	<b>8.07%</b>

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>LOUISVILLE GAS AND ELECTRIC COMPANY</b>	)	<b>2003-00433</b>
	)	
<b>AND</b>	)	
	)	
<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>KENTUCKY UTILITIES COMPANY</b>	)	<b>2003-00434</b>

**EXHIBIT (SJB-10)**

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate R	Water Heating Rate WH	General Service Rate GS	Rate LC	
								Primary	Secondary
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue – Actual				\$ 768,525,785	\$ 292,624,282	\$ 989,032	\$ 108,199,109	\$ 8,991,846	\$ 133,330,572
<b>Pro-Forma Adjustments:</b>									
Eliminate unbilled revenue				(1,867,000)	(715,724)	(2,428)	(271,251)	(21,338)	(322,331)
Mismatch in fuel cost recovery				(4,406,145)	(1,479,166)	(6,691)	(513,321)	(58,331)	(791,604)
To Reflect a Full Year of the FAC Roll-In		FACRI	Energy	547,241	181,639	1,202	87,109	11,617	139,923
Remove ECR revenues		ECRREV		(11,228,429)	(4,264,952)	(15,362)	(1,630,456)	(127,642)	(1,940,152)
To Reflect a Full Year of the ECR Roll-In		ECRRI		723,260	255,297	937	110,897	9,089	133,401
Remove off-system ECR revenues			PLPPT	(1,929,923)	(828,582)	(1,405)	(252,326)	(22,779)	(342,700)
Eliminate brokered sales			Energy	(22,608,445)	(7,589,772)	(34,335)	(2,633,910)	(299,304)	(4,061,814)
Eliminate ESM revenues		ESMREV		(6,974,780)	(2,763,963)	(7,154)	(1,009,115)	(80,480)	(1,196,285)
Eliminate Rate Refund Acct			R01	(7,150,231)	(2,741,076)	(9,299)	(1,038,835)	(81,725)	(1,234,463)
Eliminate DSM Revenue		DSMREV		(3,277,501)	(2,771,657)	-	(108,973)	(25,623)	(340,279)
Year End Revenue Adjustment		YREND		2,614,347	1,232,278	(9,993)	(279,531)	-	932,854
Adjustment for Merger savings			R01	(2,768,795)	(1,057,598)	(3,588)	(400,817)	(31,532)	(476,296)
Adjustment for Customer Rate Switching & CSR Credit		RATESW		(621,927)	-	-	-	-	-
VDT Amortization and Surcredit			VDTREV	44,485	17,356	57	6,447	505	7,617
Total Pro-Forma Operating Revenue				\$ 709,631,942	\$ 270,098,382	\$ 910,972	\$ 100,235,028	\$ 8,264,302	\$ 123,838,443

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LC-TOD Primary	Rate LC-TOD Secondary	Rate LP Primary	Rate LP Secondary	Rate LP-TOD Transmission	Rate LP-TOD Primary
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue – Actual				\$ 14,861,285	\$ 18,923,999	\$ 6,286,088	\$ 34,365,122	\$ 16,503,526	\$ 78,762,216
Pro-Forma Adjustments:									
Eliminate unbilled revenue				(34,589)	(45,400)	(14,766)	(83,348)	(37,178)	(183,683)
Mismatch in fuel cost recovery			R01 Energy	(98,406)	(118,786)	(42,016)	(212,910)	(138,932)	(601,261)
To Reflect a Full Year of the FAC Roll-In		FACRI		16,117	24,738	5,030	28,206	10,866	20,692
Remove ECR revenues		ECRREV		(207,809)	(275,776)	(89,065)	(505,167)	(223,730)	(1,130,594)
To Reflect a Full Year of the ECR Roll-In		ECRRI		14,884	21,249	5,484	35,195	16,754	67,122
Remove off-system ECR revenues			PLPPT Energy	(36,229)	(46,333)	(16,419)	(76,836)	(33,178)	(148,058)
Eliminate brokered sales				(504,933)	(608,504)	(215,588)	(1,092,466)	(712,877)	(3,065,143)
Eliminate ESM revenues		ESMREV		(130,047)	(164,826)	(53,219)	(301,627)	(135,771)	(645,195)
Eliminate Rate Refund Acct		DSMREV	R01	(132,468)	(173,873)	(56,551)	(319,207)	(142,383)	(703,468)
Eliminate DSM Revenue		YREND		(14,688)	(16,281)	-	-	-	-
Year End Revenue Adjustment			R01	(51,111)	(67,086)	(21,819)	(147,900)	(54,936)	(271,421)
Adjustment for Merger savings				-	-	-	(123,161)	(276,699)	(252,228)
Adjustment for Customer Rate Switching & CSR Credit		RATESW		815	1,070	349	1,955	867	4,284
VDT Amortization and Surcredit		VDTREV		-	-	-	-	-	-
Total Pro-Forma Operating Revenue				\$ 13,482,820	\$ 18,019,270	\$ 5,787,507	\$ 31,863,456	\$ 14,773,330	\$ 71,833,262

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LP-TOD Secondary	Street Lighting Rate PSL	Street Lighting Rate SLE	Street Lighting Rate OL	Street Lighting Rate TLE	Special Contracts
<b>Cost of Service Summary -- Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue -- Actual				\$ 2,660,042	\$ 5,593,988	\$ 188,954	\$ 6,790,363	\$ 711,578	\$ 38,913,781
Pro-Forma Adjustments:									
Eliminate unbilled revenue				(6,454)	(15,880)	(464)	(19,577)	(1,786)	(90,792)
Mismatch in fuel cost recovery			R01 Energy	(16,458)	(19,759)	(1,535)	(20,526)	(4,410)	(282,033)
To Reflect a Full Year of the FAC Roll-In		FACRI		1,436	(3,891)	156	(1,432)	797	23,036
Remove ECR revenues		ECRREV		(40,296)	(98,342)	(3,010)	(121,526)	(11,097)	(543,453)
To Reflect a Full Year of the ECR Roll-In		ECRR1		3,088	6,611	212	9,072	811	33,157
Remove off-system ECR revenues			PLPPT Energy	(6,626)	-	-	-	(920)	(87,552)
Eliminate brokered sales				(84,446)	(101,383)	(7,875)	(105,321)	(22,630)	(1,447,143)
Eliminate ESM revenues		ESMREV		(20,232)	(57,193)	(1,416)	(65,875)	(6,308)	(335,874)
Eliminate Rate Refund Acct			R01	(24,719)	(60,854)	(1,778)	(74,974)	(6,841)	(347,716)
Eliminate DSM Revenue		DSMREV		-	-	-	-	-	-
Year End Revenue Adjustment		YREND		(9,537)	2,999	(1,159)	17,114	5,808	(134,160)
Adjustment for Merger savings				-	(23,479)	(666)	(26,928)	(2,639)	(90,000)
Adjustment for Customer Rate Switching & CSR Credit		RATESW		146	364	10	453	-	2,148
VDT Amortization and Surcredit			VDTREV	-	-	-	-	41	-
Total Pro-Forma Operating Revenue				\$ 2,475,943	\$ 5,223,172	\$ 171,410	\$ 6,378,844	\$ 662,403	\$ 35,613,399

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate R	Water Heating Rate WH	General Service Rate GS	Rate LC	
								Primary	Secondary
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				508,149,420 \$	205,851,355 \$	1,076,705 \$	64,959,501 \$	5,807,311 \$	83,695,315
Depreciation and Amortization Expenses				95,827,965	45,621,527	285,767	13,673,828	925,623	14,410,830
Accrion Expense				462,519	198,570	337	67,661	5,459	82,130
Property and Other Taxes			NPT	12,603,252	5,952,910	35,308	1,802,008	123,902	1,922,763
Amortization of Investment Tax Credit				(4,010,380)	(1,684,228)	(11,235)	(573,403)	(38,426)	(611,827)
Other Expenses				(6,055,342)	(2,860,128)	(16,964)	(865,791)	(59,530)	(923,808)
Slate and Federal Income Taxes			TXINCPF	27,184,243 \$	(1,043,177) \$	(231,209) \$	5,926,115 \$	444,554 \$	7,819,968
Specific Assignment of Interruptible Credit				(3,519,894)	-	-	-	-	-
Allocation of Interruptible Credits			SCP	3,519,894 \$	1,511,175 \$	2,563 \$	514,921 \$	41,545 \$	625,034
Adjustments to Operating Expenses:									
Eliminate mismatch in fuel cost recovery			Energy	(2,005,300) \$	(873,190) \$	(3,045) \$	(233,620) \$	(26,547) \$	(360,271)
Remove ECR expenses			ECRREV	(1,766,344) \$	(670,920) \$	(2,417) \$	(256,487) \$	(20,079) \$	(305,205)
Eliminate brokered sales expenses			Energy	(25,030,766) \$	(9,402,956) \$	(38,013) \$	(2,916,114) \$	(331,372) \$	(4,497,006)
Eliminate DSM Expenses			DSMREV	(3,280,013) \$	(2,773,781) \$	-	(109,057) \$	(25,643) \$	(340,540)
Year end Expense adjustment			YREND	1,458,544 \$	687,488 \$	(5,575) \$	(155,950) \$	86,544 \$	520,439
Adjustment to annualize depreciation expense			DET	8,959,741 \$	4,265,530 \$	26,719 \$	1,278,478 \$	86,544 \$	1,347,386
Depreciation adjustment			DET	-	-	-	-	-	-
Labor adjustment			LBT	918,580 \$	444,635 \$	2,847 \$	130,256 \$	8,958 \$	133,549
Adjustment for pension and post Ret Exp. (See Functional Assignment)			SDALL	70,492 \$	46,793 \$	664 \$	9,491 \$	283 \$	5,995
Storm damage adjustment			OMT	333,580 \$	135,133 \$	707 \$	42,643 \$	3,878 \$	54,943
Adjustment to eliminate advertising expense (See Functional Assignment)			ROT	56,333 \$	22,362 \$	76 \$	6,475 \$	667 \$	10,071
Amortization of rate case expenses									
Amortization of ESM audit expenses									
Remove one-utility cost (See Functional Assignment)									
Adjustment for injuries and damages (See Functional Assignment)									
Adjustment for VDT net savings to shareholders			LBT	5,640,000 \$	2,730,022 \$	17,481 \$	799,758 \$	55,001 \$	619,977
Adjustment for merger savings			LBT	19,427,401 \$	9,403,764 \$	60,215 \$	2,754,825 \$	189,454 \$	2,824,471
Adjustment for merger amortization expenses			LBT	(2,722,005) \$	(1,317,577) \$	(8,437) \$	(385,983) \$	(25,545) \$	(395,741)
MISO Schedule 10 one time credit			PLTRT	709,577 \$	304,638 \$	517 \$	103,803 \$	8,375 \$	126,001
Adjustment cumulative effect of accounting change			DET	5,280,908 \$	2,514,121 \$	15,748 \$	753,540 \$	51,009 \$	794,155
Remove Alstom Expenses			LBT	(431,834) \$	(209,028) \$	(1,338) \$	(61,235) \$	(4,211) \$	(62,783)
Adjustment for obsolete inventory write-off			PLPPT	(2,157,640) \$	(926,327) \$	(1,571) \$	(315,638) \$	(25,467) \$	(383,136)
Adjustment for corporate office lease			PLT	(1,373,632) \$	(649,750) \$	(3,850) \$	(196,237) \$	(13,467) \$	(209,102)
Adjustment for carbide line write-off			LBT	1,798,420 \$	870,519 \$	5,574 \$	255,018 \$	17,538 \$	261,465
Adjustment for Cane Run repair refund			Energy	(1,416,711) \$	(475,597) \$	(2,152) \$	(165,948) \$	(18,755) \$	(234,525)
VDT Amortization and Surcredit			PLPPT	3,588,000 \$	1,540,415 \$	2,613 \$	524,884 \$	42,349 \$	637,127
Total Expense Adjustments			VDITREV	(224,718) \$	(87,676) \$	(286) \$	(32,570) \$	(2,549) \$	(38,480)
				7,834,614	6,778,619	66,505	1,833,234	(30,580)	688,790
Total Operating Expenses		TOE		\$ 641,996,290 \$	260,116,624 \$	1,207,777 \$	87,338,074 \$	7,318,859 \$	107,709,214
Net Operating Income – Pro-Forma				\$ 67,635,652 \$	9,981,759 \$	(296,805) \$	12,896,954 \$	945,443 \$	16,129,229
Net Cost Rate Base				\$ 1,473,843,556 \$	696,707,368 \$	4,223,971 \$	209,635,156 \$	14,412,525 \$	223,363,330
<b>Rate of Return</b>				<b>4.59%</b>	<b>1.43%</b>	<b>-7.03%</b>	<b>6.15%</b>	<b>1.00%</b>	<b>7.22%</b>

LOUISVILLE GAS AND ELECTRIC COMPANY  
Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LC-TOD Primary	Rate LC-TOD Secondary	Rate LP Primary	Rate LP Secondary	Rate LP-TOD Transmission	Rate LP-TOD Primary
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				\$ 9,698,253	\$ 11,969,168	\$ 4,283,547	\$ 21,176,674	\$ 12,069,741	\$ 53,682,562
Depreciation and Amortization Expenses				1,461,792	1,911,565	674,858	3,278,713	1,211,500	6,083,225
Accretion Expense				8,682	11,104	3,935	18,414	7,961	35,483
Property and Other Taxes			NPT	195,807	255,508	90,236	436,668	163,929	814,639
Amortization of Investment Tax Credit				(62,306)	(81,303)	(26,713)	(139,012)	(52,163)	(259,220)
Other Expenses				(94,077)	(122,761)	(43,355)	(208,697)	(78,761)	(391,461)
State and Federal Income Taxes			TXINCPFF	733,001	1,243,968	231,896	2,442,236	1,183,356	4,896,552
Specific Assignment of Interruptible Credit				-	-	-	-	(1,637,062)	(1,396,833)
Allocation of Interruptible Credits			SCP	66,076	84,505	29,945	140,138	60,511	270,035
<b>Adjustments to Operating Expenses:</b>									
Eliminate mismatch in fuel cost recovery			Energy	(44,786)	(54,061)	(19,122)	(96,898)	(63,230)	(273,643)
Remove ECR expenses			ECRREV	(32,690)	(43,382)	(14,011)	(79,468)	(35,195)	(177,854)
Eliminate brokered sales expenses			Energy	(559,033)	(674,807)	(238,667)	(1,209,515)	(789,257)	(3,415,692)
Eliminate DSM Expenses			DSMREV	(14,698)	(16,293)	-	-	-	-
Year end Expense adjustment			YREND	-	315,814	-	82,513	-	-
Adjustment to annualize depreciation expense			DET	136,675	178,728	63,098	306,554	113,273	589,706
Depreciation adjustment			DET	-	-	-	-	-	-
Labor adjustment			LBT	14,031	17,857	6,596	31,348	14,187	67,403
Adjustment for pension and post Ret Exp. (See Functional Assignment)			SDALL	454	719	221	1,509	-	2,235
Storm damage adjustment			OMT	6,367	7,857	2,812	13,902	7,923	35,240
Adjustment to eliminate advertising expense (See Functional Assignment)			RO1	1,081	1,418	461	2,604	1,162	5,739
Amortization of rate case expenses				-	-	-	-	-	-
Amortization of ESM audit expenses				-	-	-	-	-	-
Remove one-utility cost (See Functional Assignment)				-	-	-	-	-	-
Adjustment for injuries and damages (See Functional Assignment)			LBT	86,151	109,641	40,498	192,472	87,109	413,851
Adjustment for VDT net savings to shareholders			LBT	296,754	377,668	139,500	662,984	300,054	1,425,542
Adjustment for merger savings			LBT	(41,579)	(52,916)	(19,546)	(92,892)	(42,041)	(199,735)
Adjustment for merger amortization expenses			PLTRT	13,320	17,035	6,037	28,230	12,199	54,437
MISO Schedule 10 one time credit			DET	80,557	105,343	37,190	180,664	66,764	335,767
Adjustment cumulative effect of accounting change			LBT	(6,596)	(8,395)	(3,101)	(14,737)	(6,670)	(31,687)
Adjustment for IT staff reduction			PLPPT	(40,503)	(51,800)	(18,356)	(85,902)	(37,093)	(165,527)
Remove Alstom Expenses			PLT	(21,281)	(27,779)	(9,810)	(47,519)	(17,789)	(88,563)
Adjustment for obsolete inventory write-off			LBT	27,471	34,961	12,914	61,373	27,776	131,964
Adjustment for corporate office lease			Energy	(31,641)	(38,193)	(13,509)	(68,457)	(44,671)	(193,324)
Adjustment for carbide lime write-off			PLPPT	67,354	86,140	30,525	142,849	61,662	275,260
Adjustment for Cane Run repair refund			VDTREV	(4,116)	(5,407)	(1,762)	(9,674)	(4,381)	(21,640)
VDT Amortization and Surcredit				(66,710)	280,149	1,949	(1,780)	(348,197)	(1,250,502)
Total Expense Adjustments				\$ 11,840,518	\$ 15,551,903	\$ 5,244,297	\$ 27,145,913	\$ 12,580,806	\$ 62,494,541
Total Operating Expenses			TOE	\$ 1,542,302	\$ 2,467,367	\$ 543,210	\$ 4,717,543	\$ 2,192,524	\$ 9,338,720
<b>Net Operating Income – Pro-Forma</b>				\$ 22,799,127	\$ 29,725,634	\$ 10,502,278	\$ 50,993,425	\$ 19,343,767	\$ 96,231,548
<b>Net Cost Rate Base</b>									
<b>Rate of Return</b>				<b>6.76%</b>	<b>8.30%</b>	<b>6.17%</b>	<b>9.25%</b>	<b>11.35%</b>	<b>9.70%</b>

LOUISVILLE GAS AND ELECTRIC COMPANY  
Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LP-TOD Secondary	Street Lighting Rate PSL	Street Lighting Rate SLE	Street Lighting Rate OL	Street Lighting Rate TLE	Special Contracts
<b>Cost of Service Summary -- Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				\$ 1,709,113	\$ 2,438,507	\$ 116,096	\$ 2,751,303	\$ 400,208	\$ 26,364,063
Depreciation and Amortization Expenses				292,817	1,056,322	4,904	1,413,546	43,828	3,465,322
Accretion Expense				1,588	-	-	-	221	20,982
Property and Other Taxes			NPT	38,893	128,038	593	171,013	5,784	465,052
Amortization of Investment Tax Credit				(12,376)	(40,742)	(169)	(54,417)	(1,640)	(147,960)
Other Expenses				(18,686)	(61,517)	(285)	(82,165)	(2,779)	(223,438)
State and Federal Income Taxes			TXINCPF	143,208	520,472	21,838	649,315	81,056	2,121,074
Specific Assignment of Interruptible Credit				-	-	-	-	-	(486,000)
Allocation of Interruptible Credits			SCP	12,085	-	-	-	1,678	159,682
<b>Adjustments to Operating Expenses:</b>									
Eliminate mismatch in fuel cost recovery				(7,490)	(8,992)	(698)	(9,342)	(2,007)	(128,357)
Remove ECR expenses				(6,339)	(15,470)	(474)	(19,117)	(1,746)	(85,491)
Eliminate brokered sales expenses				(93,494)	(112,246)	(8,719)	(116,606)	(25,054)	(1,602,194)
Eliminate DSM Expenses				-	-	-	-	-	-
Year end Expense adjustment				-	1,673	(647)	9,548	3,240	-
Adjustment to annualize depreciation expense				27,378	98,951	459	132,164	4,098	324,001
Depreciation adjustment				-	-	-	-	-	-
Labor adjustment				2,684	3,877	114	4,442	546	35,249
Adjustment for pension and post Ret Exp. (See Functional Assignment)				164	487	15	508	27	896
Storm damage adjustment				-	-	-	-	-	-
Adjustment to eliminate advertising expense (See Functional Assignment)				1,122	1,601	76	1,806	263	17,307
Amortization of rate case expenses				202	486	15	612	96	2,837
Amortization of ESM audit expenses				-	-	-	-	-	-
Remove one-utility cost (See Functional Assignment)				-	-	-	-	-	-
Adjustment for injuries and damages (See Functional Assignment)				-	-	-	-	-	-
Adjustment for VDT net savings to shareholders				16,480	23,605	700	27,273	3,355	216,426
Adjustment for merger savings				56,766	81,999	2,413	93,942	11,556	745,494
Adjustment for merger amortization expenses				(7,954)	(11,489)	(338)	(13,162)	(1,619)	(104,452)
MISO Schedule 10 one time credit				2,436	-	-	-	336	32,190
Adjustment cumulative effect of accounting change				16,137	58,322	270	77,898	2,415	190,968
Adjustment for IT staff reduction				(1,262)	(1,823)	(54)	(2,068)	(257)	(16,571)
Remove Alston Expenses				(7,408)	-	-	-	(1,029)	(97,883)
Adjustment for Obsolete inventory write-off				(4,233)	(14,138)	(65)	(18,888)	(630)	(50,529)
Adjustment for corporate office lease				5,255	7,591	223	6,696	1,070	69,011
Adjustment for cable line write-off				(5,282)	(6,353)	(493)	(6,600)	(1,418)	(90,662)
Adjustment for Cane Run repair refund				12,319	-	-	-	1,711	162,772
VDT Amortization and Surcredit				(738)	(1,836)	(52)	(2,290)	(206)	(10,853)
Total Expense Adjustments				6,734	106,456	(7,256)	168,786	(5,292)	(389,859)
Total Operating Expenses		TOE		\$ 2,173,375	\$ 4,149,537	\$ 135,701	\$ 5,017,391	\$ 522,862	\$ 31,348,898
Net Operating Income -- Pro-Forma				\$ 302,568	\$ 1,073,635	\$ 35,709	\$ 1,361,453	\$ 139,541	\$ 4,264,501
Net Cost Rate Base				\$ 4,532,030	\$ 15,517,408	\$ 81,900	\$ 20,881,627	\$ 691,027	\$ 54,401,435
<b>Rate of Return</b>				<b>6.68%</b>	<b>6.92%</b>	<b>43.60%</b>	<b>6.68%</b>	<b>20.19%</b>	<b>7.84%</b>

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>LOUISVILLE GAS AND ELECTRIC COMPANY</b>	)	<b>2003-00433</b>
	)	
<b>AND</b>	)	
	)	
<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>KENTUCKY UTILITIES COMPANY</b>	)	<b>2003-00434</b>

**EXHIBIT (SJB-11)**

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Allocation Vector	Total System	Residential Rate R	Water Heating Rate WH	General Service Rate GS	Rate LC	
							Primary	Secondary
<b>Cost of Service Summary – Pro-Forma</b>								
<b>Operating Revenues</b>								
Total Operating Revenue – Actual			\$ 768,525,785	\$ 289,945,333	\$ 1,027,181	\$ 107,388,029	\$ 8,963,998	\$ 134,147,781
Pro-Forma Adjustments:								
Eliminate unbilled revenue		R01 Energy	(1,867,000)	(715,724)	(2,428)	(271,251)	(21,339)	(322,331)
Mismatch in fuel cost recovery			(4,406,145)	(1,479,166)	(6,691)	(513,321)	(58,331)	(781,604)
To Reflect a Full Year of the FAC Roll-in		FACRI	547,241	181,639	1,202	87,109	11,617	138,923
Remove ECR revenues		ECRREV	(11,228,428)	(4,284,952)	(15,362)	(1,630,456)	(127,642)	(1,940,152)
To Reflect a Full Year of the ECR Roll-in		ECRR!	723,260	255,297	937	110,897	9,089	133,401
Remove off-system ECR revenues		PLPPT	(1,929,923)	(734,104)	(2,398)	(253,023)	(21,797)	(371,514)
Eliminate brokered sales		Energy	(22,608,445)	(7,589,772)	(34,335)	(2,633,910)	(299,304)	(4,061,814)
Eliminate ESM revenues		ESMREV	(6,974,780)	(2,763,963)	(7,154)	(1,009,115)	(80,480)	(1,196,265)
Eliminate Rate Refund Acct		R01	(7,150,231)	(2,741,076)	(9,298)	(1,038,835)	(81,725)	(1,234,463)
Eliminate DSM Revenue		DSMREV	(3,277,501)	(2,771,657)	-	(108,973)	(25,623)	(340,279)
Year End Revenue Adjustment		YREND	2,614,347	1,232,278	(9,983)	(279,531)	-	932,854
Adjustment for Merger savings		R01	(2,758,795)	(1,057,598)	(3,588)	(400,817)	(31,532)	(476,296)
Adjustment for Customer Rate Switching & CSR Credit		RATESW	(621,927)	-	-	-	-	-
VDT Amortization and Surcredit		VDTREV	44,485	17,356	57	6,447	505	7,617
Total Pro-Forma Operating Revenue			\$ 709,631,942	\$ 267,513,891	\$ 936,129	\$ 99,433,251	\$ 8,237,436	\$ 124,626,847

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LC-TOD		Rate LP		Rate LP-TOD		Rate LP-TOD Primary					
				Primary	Secondary	Primary	Secondary	Transmission	Primary						
<b>Cost of Service Summary -- Pro-Forma</b>															
<b>Operating Revenues</b>															
Total Operating Revenue -- Actual				\$	14,611,283	\$	19,185,651	\$	6,326,234	\$	34,518,858	\$	16,707,671	\$	80,517,847
Pro-Forma Adjustments:															
Eliminate unbilled revenue				\$	(34,588)	\$	(45,400)	\$	(14,766)	\$	(83,348)	\$	(37,178)	\$	(183,663)
Mismatch in fuel cost recovery			R01 Energy		(98,406)		(116,786)		(42,016)		(212,910)		(138,932)		(601,261)
To Reflect a Full Year of the FAC Roll-In		FACRI			16,117		24,738		5,030		28,206		10,866		20,692
Remove ECR revenues		ECRREV			(207,809)		(275,776)		(89,065)		(605,167)		(223,730)		(1,130,594)
To Reflect a Full Year of the ECR Roll-In		ECRRI			14,884		21,249		5,484		35,195		16,754		67,122
Remove off-system ECR revenues			PLPPT Energy		(34,466)		(55,559)		(17,834)		(82,257)		(40,376)		(209,960)
Eliminate brokered sales					(504,933)		(609,504)		(215,588)		(1,082,466)		(712,877)		(3,085,143)
Eliminate ESM revenues		ESMREV			(130,047)		(164,826)		(53,219)		(301,827)		(135,771)		(645,195)
Eliminate Rate Refund Acct			R01		(132,469)		(173,873)		(56,551)		(319,207)		(142,383)		(703,468)
Eliminate DSM Revenue		DSMREV			(14,688)		(16,281)		-		(147,900)		-		-
Year End Revenue Adjustment		YREND			(51,111)		(67,086)		(21,819)		(123,161)		(54,936)		(271,421)
Adjustment for Merger savings					-		-		-		-		(279,689)		(252,228)
Adjustment for Customer Rate Switching & CSR Credit		RATESW			815		1,070		349		1,955		867		4,284
VDT Amortization and Surcredit			VDTREV		-		-		-		-		-		-
Total Pro-Forma Operating Revenue				\$	13,434,580	\$	16,271,695	\$	5,826,237	\$	32,011,772	\$	14,970,278	\$	73,526,990

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LP-TOD Secondary	Street Lighting Rate PSL	Street Lighting Rate SLE	Street Lighting Rate OL	Street Lighting Rate TLE	Special Contracts
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Revenues</b>									
Total Operating Revenue – Actual				\$ 2,662,722	\$ 5,655,911	\$ 194,251	\$ 6,854,604	\$ 724,458	\$ 39,113,964
Pro-Forma Adjustments:									
Eliminate unbilled revenue				(6,454)	(15,890)	(464)	(19,577)	(1,786)	(90,792)
To Reflect a Full Year of the PAC Roll-In		FACRI	Energy	(16,458)	(19,759)	(1,585)	(20,526)	(4,410)	(282,033)
Remove ECR revenues		ECRREV		1,436	(3,891)	186	(1,432)	797	23,036
To Reflect a Full Year of the ECR Roll-In		ECRRI		(40,296)	(98,342)	(3,010)	(121,526)	(11,087)	(543,453)
Remove off-system ECR revenues				3,088	6,611	212	9,072	811	33,157
Eliminate brokered sales				(6,015)	(2,183)	(187)	(2,265)	(1,374)	(94,610)
Eliminate ESM revenues		ESMREV	Energy	(84,446)	(101,383)	(7,875)	(105,321)	(22,630)	(1,447,143)
Eliminate Rate Refund Acct				(20,232)	(57,183)	(1,416)	(65,875)	(6,308)	(335,874)
Eliminate DSM Revenue		DSMREV	R01	(24,719)	(60,854)	(1,778)	(74,874)	(6,841)	(347,716)
Year End Revenue Adjustment		YREND		-	2,989	(1,159)	17,114	5,808	-
Adjustment for Merger savings				(9,537)	(23,479)	(686)	(28,928)	(2,639)	(134,160)
Adjustment for Customer Rate Switching & CSR Credit		RATESW		-	-	-	-	-	(90,000)
VDT Amortization and Surcredit			VDTREV	146	364	10	453	41	2,148
Total Pro-Forma Operating Revenue				\$ 2,459,233	\$ 5,282,911	\$ 176,520	\$ 6,440,820	\$ 674,830	\$ 35,806,523

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Total System	Residential Rate R	Water Heating Rate WH	General Service Rate GS	Rate LC Primary	Rate LC Secondary
<b>Cost of Service Summary -- Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				508,149,420 \$	199,108,198 \$	1,147,550 \$	62,867,909 \$	5,637,225 \$	85,752,023
Depreciation and Amortization Expenses				95,827,965	42,190,941	321,814	12,609,571	889,962	15,457,337
Accrual Expense				462,519	175,933	575	60,638	5,224	89,036
Property and Other Taxes			NPT	12,603,252	5,488,447	40,188	1,657,920	119,074	2,064,448
Amortization of Investment Tax Credit				(4,010,380)	(1,746,435)	(12,788)	(527,553)	(37,880)	(656,912)
Other Expenses			TXINCPF	(2,636,972)	(2,636,972)	(19,309)	(796,562)	(57,210)	(991,882)
State and Federal Income Taxes				27,184,243 \$	2,736,402 \$	(270,924) \$	7,098,638 \$	483,843 \$	6,867,019
Specific Assignment of Interruption Credit			SCP	(3,519,894)	1,511,175 \$	2,563 \$	514,921 \$	41,545 \$	625,034
Allocation of Intangible Credits				3,519,894 \$	1,511,175 \$	2,563 \$	514,921 \$	41,545 \$	625,034
Adjustments to Operating Expenses:									
Eliminate mismatch in fuel cost recovery			Energy	(2,005,300) \$	(673,190) \$	(3,045) \$	(233,620) \$	(26,547) \$	(360,271)
Remove ECR expenses			ECRREV	(1,766,344) \$	(670,920) \$	(2,417) \$	(256,487) \$	(20,079) \$	(305,205)
Eliminate brokered sales expenses			Energy	(25,030,766) \$	(8,402,959) \$	(38,013) \$	(2,916,114) \$	(331,372) \$	(4,497,006)
Eliminate DSM Expenses			DSMREV	(3,280,013) \$	(2,773,781) \$	- \$	(109,057) \$	(25,643) \$	(340,540)
Year end Expense adjustment			YREND	1,458,544 \$	687,488 \$	(5,575) \$	(155,950) \$	- \$	520,439
Adjustment to annualize depreciation expense			DET	8,959,741 \$	3,944,776 \$	30,089 \$	1,178,972 \$	83,210 \$	1,445,233
Depreciation adjustment			DET	- \$	- \$	- \$	- \$	- \$	- \$
Labor adjustment			LBT	918,580 \$	423,052 \$	3,074 \$	123,560 \$	8,734 \$	140,133
Adjustment for pension and post Ret Exp. (See Functional Assignment)			SDALL	70,492 \$	46,793 \$	694 \$	9,491 \$	283 \$	5,995
Storm damage adjustment			OMT	333,580 \$	130,707 \$	753 \$	41,270 \$	3,832 \$	56,293
Adjustment to eliminate advertising expense (See Functional Assignment)			R01	58,333 \$	22,362 \$	76 \$	8,475 \$	687 \$	10,071
Amortization of rate case expenses									
Remove one-utility cost (See Functional Assignment)			LBT	5,640,000 \$	2,597,500 \$	18,874 \$	759,646 \$	53,623 \$	860,403
Adjustment for injuries and damages (See Functional Assignment)			LBT	19,427,401 \$	8,947,281 \$	65,011 \$	3,947,213 \$	184,709 \$	2,963,722
Adjustment for VDT net savings to shareholders			LBT	(2,722,005) \$	(1,253,618) \$	(9,109) \$	(386,142) \$	(25,880) \$	(415,252)
Adjustment for merger savings			PLTRT	709,577 \$	269,909 \$	862 \$	93,029 \$	8,014 \$	136,565
MISO Schedule 10 one time credit			DET	5,280,909 \$	2,325,066 \$	17,735 \$	694,891 \$	49,044 \$	851,826
Adjustment cumulative effect of accounting change			LBT	(431,834) \$	(198,881) \$	(1,445) \$	(58,087) \$	(4,106) \$	(65,878)
Adjustment for IT staff reduction			PLPPT	(2,157,640) \$	(820,723) \$	(2,661) \$	(282,877) \$	(24,369) \$	(415,350)
Remove Alstom Expenses			PLT	(1,373,632) \$	(599,352) \$	(4,380) \$	(180,603) \$	(12,944) \$	(224,476)
Adjustment for obsolete inventory write-off			LBT	1,798,420 \$	828,262 \$	6,018 \$	241,909 \$	17,099 \$	274,356
Adjustment for corporate office lease			Energy	(1,416,711) \$	(476,597) \$	(2,152) \$	(165,048) \$	(18,755) \$	(254,525)
Adjustment for carbide line write-off			PIPPI	3,566,000 \$	1,364,803 \$	4,458 \$	470,405 \$	40,524 \$	690,688
Adjustment for Caride Run repair refund			VDTREV	(224,718) \$	(87,676) \$	(286) \$	(32,570) \$	(2,349) \$	(38,460)
VDT Amortization and Surcredit				7,834,614	5,631,305	78,561	1,477,307	(42,506)	1,038,790
Total Expense Adjustments				641,996,290 \$	252,459,995 \$	1,288,231 \$	84,962,789 \$	7,239,267 \$	110,044,864
Total Operating Expenses			TOE	\$	\$	\$	\$	\$	\$
<b>Net Operating Income -- Pro-Forma</b>				67,635,652 \$	15,053,897 \$	(350,102) \$	14,470,463 \$	998,169 \$	14,581,963
<b>Net Cost Rate Base</b>				1,473,843,556 \$	644,527,736 \$	4,772,258 \$	193,447,660 \$	13,870,109 \$	239,280,834
<b>Rate of Return</b>				<b>4.59%</b>	<b>2.34%</b>	<b>-7.34%</b>	<b>7.48%</b>	<b>1.00%</b>	<b>6.05%</b>

LOUISVILLE GAS AND ELECTRIC COMPANY  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LC-TOD Primary	Rate LC-TOD Secondary	Rate LP Primary	Rate LP Secondary	Rate LP-TOD Transmission	Rate LP-TOD Primary
<b>Cost of Service Summary -- Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				\$ 9,572,410	\$ 12,627,670	\$ 4,384,582	\$ 21,563,584	\$ 12,583,514	\$ 58,100,988
Depreciation and Amortization Expenses				1,397,760	2,246,628	726,267	3,475,583	1,472,921	8,341,436
Accrual Expense				8,260	13,315	4,274	19,713	9,676	50,318
Property and Other Taxes			NPT	187,137	300,872	87,197	463,522	199,323	1,119,022
Amortization of Investment Tax Credit				(59,547)	(95,736)	(30,926)	(147,494)	(63,425)	(356,075)
Other Expenses			TXINCPF	(89,812)	(144,556)	(46,698)	(222,703)	(95,768)	(537,644)
State and Federal Income Taxes				803,548	874,819	175,256	2,225,338	895,341	2,419,630
Specific Assignment of Interruptible Credit								(1,637,062)	(1,396,833)
Allocation of Interruptible Credits			SCP	66,076	84,505	29,945	140,138	60,511	270,035
<b>Adjustments to Operating Expenses:</b>									
Eliminate mismatch in fuel cost recovery			Energy	(44,786)	(54,061)	(19,122)	(96,898)	(63,230)	(273,643)
Remove ECR expenses			ECRREV	(32,690)	(43,362)	(14,011)	(79,468)	(35,195)	(177,854)
Eliminate brokered sales expenses			Energy	(559,033)	(674,807)	(238,687)	(1,209,515)	(789,257)	(3,415,692)
Eliminate DSM Expenses			DSMREV	(14,699)	(16,293)	-	-	-	-
Year end Expense adjustment			YREND	-	315,814	-	82,513	-	-
Adjustment to annualize depreciation expense			DET	130,688	210,056	67,905	324,961	137,715	779,909
Depreciation adjustment			DET	-	-	-	-	-	-
Labor adjustment			LBT	13,628	19,965	6,919	32,566	15,832	81,548
Adjustment for pension and post Ret Exp. (See Functional Assignment)			SDALL	454	719	221	1,509	-	2,235
Storm damage adjustment			OMT	6,284	8,290	2,878	14,156	8,261	38,141
Adjustment to eliminate advertising expense (See Functional Assignment)			RO1	1,081	1,416	461	2,604	1,162	5,739
Amortization of rate case expenses									
Amortization of ESM audit expenses									
Remove one-utility cost (See Functional Assignment)									
Adjustment for injuries and damages (See Functional Assignment)			LBT	83,678	122,585	42,484	200,077	97,208	500,689
Adjustment for VDI net savings to shareholders			LBT	288,234	422,252	146,341	689,180	334,838	1,724,685
Adjustment for merger savings			LBT	(40,385)	(59,162)	(20,504)	(96,662)	(46,915)	(241,660)
Adjustment for merger amortization expenses			PLTRT	12,672	20,427	6,557	30,243	14,846	77,196
MISO Schedule 10 one time credit			DET	77,028	123,808	40,023	191,533	81,170	459,662
Adjustment cumulative effect of accounting change			LBT	(6,407)	(9,386)	(3,253)	(15,319)	(7,443)	(38,337)
Remove Alstom Expenses			PLPPT	(38,532)	(62,114)	(19,939)	(91,962)	(45,140)	(234,734)
Adjustment for obsolete inventory write-off			PLT	(20,340)	(32,701)	(10,565)	(50,411)	(21,629)	(121,581)
Adjustment for corporate office lease			LBT	26,682	39,088	13,547	63,798	30,966	159,657
Adjustment for carbide lime write-off			Energy	(31,641)	(38,193)	(13,509)	(68,457)	(44,671)	(193,324)
Adjustment for Cane Run repair refund			PLPPT	64,077	103,292	33,156	152,927	75,064	390,346
VDI Amortization and Surcredit			VDTREV	(4,116)	(5,407)	(1,762)	(9,874)	(4,381)	(21,640)
Total Expense Adjustments				(88,125)	382,206	19,142	67,620	(260,769)	(498,618)
Total Operating Expenses		TOE		\$ 11,797,606	\$ 16,299,721	\$ 5,359,037	\$ 27,585,302	\$ 13,164,265	\$ 67,512,261
Net Operating Income -- Pro-Forma				\$ 1,636,974	\$ 1,971,975	\$ 467,201	\$ 4,426,470	\$ 1,806,012	\$ 6,014,729
Net Cost Rate Base				\$ 21,825,190	\$ 34,821,982	\$ 11,284,222	\$ 53,987,843	\$ 23,320,016	\$ 130,427,115
<b>Rate of Return</b>				<b>7.50%</b>	<b>5.65%</b>	<b>4.14%</b>	<b>8.20%</b>	<b>7.74%</b>	<b>4.61%</b>

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Ref	Name	Allocation Vector	Rate LP-TOD Secondary	Street Lighting Rate PSL	Street Lighting Rate SLE	Street Lighting Rate OL	Street Lighting Rate TLE	Special Contracts
<b>Cost of Service Summary – Pro-Forma</b>									
<b>Operating Expenses</b>									
Operation and Maintenance Expenses				\$ 1,665,521	\$ 2,594,348	\$ 129,427	\$ 2,912,979	\$ 432,625	\$ 26,867,866
Depreciation and Amortization Expenses				270,636	1,137,618	11,687	1,485,811	60,321	3,721,670
Accretion Expense				1,442	523	45	543	329	22,674
Property and Other Taxes			NPT	35,880	138,773	1,512	182,451	8,017	489,758
Amortization of Investment Tax Credit				(11,420)	(44,158)	(481)	(57,961)	(2,551)	(189,024)
Other Expenses			TXINCPF	(17,243)	(66,675)	(726)	(87,516)	(3,852)	(240,113)
State and Federal Income Taxes				167,645	433,110	14,364	558,681	62,883	1,838,648
Specific Assignment of Interruptible Credit			SCP	12,085	-	-	-	1,678	(486,000)
Allocation of Interruptible Credits									159,682
<b>Adjustments to Operating Expenses:</b>									
Eliminate mismatch in fuel cost recovery			Energy	(7,490)	(8,992)	(698)	(9,342)	(2,007)	(128,357)
Remove ECR expenses			ECRREV	(6,338)	(15,470)	(474)	(19,117)	(1,746)	(85,491)
Eliminate brokered sales expenses			Energy	(93,494)	(112,246)	(8,719)	(116,606)	(25,054)	(1,602,194)
Eliminate DSM Expenses			DSMREV	-	-	-	-	-	-
Year end Expense adjustment			YREND	-	1,673	(647)	9,548	3,240	-
Adjustment to annualize depreciation expense			DEI	25,304	106,365	1,093	139,856	5,640	347,969
Depreciation adjustment			DEI	-	-	-	-	-	-
Labor adjustment			LBT	2,545	4,376	157	4,959	650	36,862
Adjustment for pension and post Ret Exp. (See Functional Assignment)			SDALL	164	487	15	508	27	886
Storm damage adjustment			OMT	1,093	1,703	85	1,912	284	17,638
Adjustment to eliminate advertising expense (See Functional Assignment)			RO1	202	486	15	612	56	2,837
Amortization of ESM audit expenses									
Remove one-utility cost (See Functional Assignment)									
Adjustment for injuries and damages (See Functional Assignment)			LBT	15,623	26,868	962	30,450	3,982	226,328
Adjustment for VDT net savings to shareholders			LBT	53,815	92,550	3,315	104,889	13,751	779,605
Adjustment for merger savings			LBT	(7,540)	(12,967)	(465)	(14,696)	(1,927)	(109,232)
Adjustment for merger amortization expenses			PLTRT	2,212	803	69	833	505	34,786
MISO Schedule 10 one time credit			DEI	14,914	62,692	644	82,431	3,324	205,095
Adjustment cumulative effect of accounting change			LBT	(1,196)	(2,057)	(74)	(2,331)	(306)	(17,329)
Remove Alstom Expenses			PLPPT	(6,725)	(2,441)	(209)	(2,532)	(1,537)	(105,774)
Adjustment for Obsolete inventory write-off			PLT	(3,907)	(15,303)	(165)	(20,097)	(873)	(54,285)
Adjustment for corporate office lease			LBT	4,982	8,568	307	9,710	1,273	72,169
Adjustment for carbide lime write-off			Energy	(5,282)	(6,353)	(493)	(6,800)	(1,418)	(90,682)
Adjustment for Cane Run repair refund			PLPPT	11,183	4,069	347	4,211	2,585	175,894
VDT Amortization and Surcredit			VDTRV	(738)	(1,899)	(52)	(2,291)	(206)	(10,853)
Total Expense Adjustments				(684)	132,975	(4,987)	196,308	225	(304,127)
Total Operating Expenses		TOE		\$ 2,123,871	\$ 4,326,516	\$ 150,840	\$ 5,200,996	\$ 559,676	\$ 31,921,034
Net Operating Income – Pro-Forma				\$ 335,362	\$ 956,395	\$ 25,680	\$ 1,239,824	\$ 115,154	\$ 3,885,489
Net Cost Rate Base				\$ 4,194,659	\$ 16,723,512	\$ 185,073	\$ 21,932,886	\$ 941,914	\$ 58,300,526
<b>Rate of Return</b>				<b>7.99%</b>	<b>5.72%</b>	<b>13.86%</b>	<b>5.65%</b>	<b>12.23%</b>	<b>6.56%</b>

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>LOUISVILLE GAS AND ELECTRIC COMPANY</b>	)	<b>2003-00433</b>
	)	
<b>AND</b>	)	
	)	
<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>KENTUCKY UTILITIES COMPANY</b>	)	<b>2003-00434</b>

**EXHIBIT (SJB-12)**

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Total System	Residential Rate RS	All Electric Residential Rate FERS	General Service GS	Combined Light & Power LP,HLF,M	Large Comm/Ind TOD Primary LCL-TOD
<b>Cost of Service Summary – Pro-Forma</b>						
Total Pro-Forma Operating Revenue	\$ 683,449,939	\$ 124,345,569	\$ 135,772,513	\$ 67,310,253	\$ 232,654,411	\$ 85,699,043
Total Operating Expenses	\$ 633,180,928	\$ 121,678,365	\$ 133,986,084	\$ 58,484,592	\$ 201,628,996	\$ 75,866,487
Net Operating Income (Adjusted)	\$ 60,269,011	\$ 2,667,204	\$ 1,786,429	\$ 8,825,661	\$ 31,025,414	\$ 9,812,546
Net Cost Rate Base	\$ 1,412,033,543	\$ 318,616,683	\$ 371,840,037	\$ 142,212,684	\$ 342,893,824	\$ 120,860,788
<b>Rate of Return</b>	<b>4.27%</b>	<b>0.84%</b>	<b>0.48%</b>	<b>6.21%</b>	<b>9.05%</b>	<b>8.12%</b>
Subsidy at Current Rates	(0)	(18,406,856)	(23,714,808)	4,659,847	27,596,286	7,635,982
<b>KU Proposed Increases</b>						
Proposed Base Rate Increase	58,911,660	10,917,610	13,171,979	5,663,282	18,928,419	6,910,666
Increase in Miscellaneous Charges	1,033,763	539,919	395,326	65,368	3,118	7
Decrease in Rents	(556,373)	(26,757)	(21,055)	(152,518)	(344,931)	(784)
Incremental Income Taxes	(24,104,760)	(4,641,041)	(5,500,915)	(2,264,378)	(7,547,723)	(2,805,995)
Net Operating Income after Increase	95,523,300	9,454,934	9,831,763	12,137,415	42,064,297	13,916,440
<b>Rate of Return at KU Proposed Rates</b>	<b>6.76%</b>	<b>2.97%</b>	<b>2.64%</b>	<b>8.63%</b>	<b>12.27%</b>	<b>11.51%</b>
Subsidy at KU Proposed Rates	(0)	(20,372,091)	(25,799,966)	4,237,644	31,768,325	9,665,129
Change in Subsidy resulting from KU Proposed Rates		10.7%	8.8%	-6.7%	15.1%	23.3%
Base Rate Increase Required for Equalized Rates of Return	58,911,660	31,289,701	38,971,945	1,425,638	(12,839,906)	(2,754,460)
Base Rate Increase Required for 25% Subsidy Reduction	58,911,660	17,484,557	21,185,839	4,905,523	7,857,308	3,122,526
Incremental Income Taxes	(24,104,760)	(7,307,774)	(8,755,215)	(1,958,664)	(3,051,922)	(1,267,692)
Net Operating Income after increase	95,523,300	13,355,149	14,581,323	11,687,370	35,488,987	11,666,603
<b>Rate of Return after 25% Subsidy Reduction</b>	<b>6.76%</b>	<b>4.19%</b>	<b>3.92%</b>	<b>8.22%</b>	<b>10.35%</b>	<b>9.65%</b>
Subsidy after 25% Subsidy Reduction	(0)	(13,805,144)	(17,786,106)	3,479,885	20,697,214	5,876,887
Change in Subsidy resulting from 25% Subsidy Reduction		-25.0%	-25.0%	-25.0%	-25.0%	-25.0%
<b>Adjusted Revenue at Current Rates</b>	676,762,013	121,233,915	131,265,061	65,598,531	226,957,350	84,135,770
Percentage Increase proposed by KU	8.70%	9.01%	10.03%	6.63%	8.34%	8.21%
Percentage Increase to achieve equalized Rates of Return	8.70%	25.81%	29.69%	2.17%	-5.66%	-3.27%
Percentage Increase to achieve 25% subsidy reduction	8.70%	14.42%	16.14%	7.48%	3.46%	3.71%

BIP Prod Trans Allocation  
 Corrected Demand Allocators  
 Removes ECR Rate Base  
 Present Revenues Reflect CSR Inlet  
 Allocates CSR Credits on SCP

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation  
 12 Months Ended  
 September 30, 2003

Description	Coal Mining Power Primary		Coal Mining Power Transmission		Large Power Mine Power TOD Primary		Large Power Mine Power TOD Transmission		Combination Off-Peak CWH		All Electric School AES		Electric Space Heating Rider	
	MPP	MPT	MPP	MPT	LMPP	LMPT	LMPP	LMPT	CWH	AES	AES	33		
<b>Cost of Service Summary -- Pro-Forma</b>														
Total Pro-Forma Operating Revenue	\$ 4,900,693	\$ 3,840,839	\$ 1,984,106	\$ 4,207,348	\$ 427,775	\$ 4,051,813	\$ 684,657							
Total Operating Expenses	\$ 3,986,444	\$ 3,209,576	\$ 1,699,608	\$ 3,676,266	\$ 1,057,389	\$ 655,878	\$ 655,878							
Net Operating Income (Adjusted)	\$ 914,249	\$ 631,263	\$ 284,498	\$ 629,614	\$ 375,547	\$ 28,779								
Net Cost Rate Base	\$ 6,738,314	\$ 5,192,612	\$ 2,812,219	\$ 8,113,387	\$ 1,490,422									
<b>Rate of Return</b>	<b>13.57%</b>	<b>12.16%</b>	<b>10.12%</b>	<b>10.27%</b>	<b>-13.93%</b>	<b>4.63%</b>	<b>1.93%</b>							
Subsidy at Current Rates	1,055,102	689,710	276,917	642,975	(1,384,849)	49,246	(58,654)							
<b>KU Proposed Increases</b>														
Proposed Base Rate Increase	405,257	319,850	165,746	347,607	96,148	-	129,034							
Increase in Miscellaneous Charges	9	6	1	3	-	-	-							
Decrease in Rents	(3,712)	(2,603)	(356)	(1,166)	-	-	-							
Incremental Income Taxes	\$ (163,065)	\$ (128,831)	\$ (67,163)	\$ (140,665)	\$ (39,044)	\$ -	\$ (52,399)							
Net Operating Income after Increase	\$ 1,152,739	\$ 819,685	\$ 382,726	\$ 859,393	\$ (572,510)	\$ 375,547	\$ 105,414							
<b>Rate of Return at KU Proposed Rates</b>	<b>17.11%</b>	<b>15.79%</b>	<b>13.61%</b>	<b>13.50%</b>	<b>-12.67%</b>	<b>4.63%</b>	<b>7.07%</b>							
Subsidy at KU Proposed Rates	1,173,390	788,676	324,088	721,761	(1,478,659)	(281,825)	7,725							
Change in Subsidy resulting from KU Proposed Rates	11.2%	14.3%	17.0%	12.3%	6.8%	-692.6%	-113.2%							
Base Rate Increase Required for Equalized Rates of Return	(768,133)	(468,826)	(158,342)	(374,154)	1,574,807	291,825	121,309							
Base Rate Increase Required for 25% Subsidy Reduction	23,193	48,456	49,345	108,077	536,171	328,759	77,318							
Incremental Income Taxes	(7,914)	(18,623)	(19,894)	(43,416)	(217,730)	(133,504)	(31,398)							
Net Operating Income after Increase	\$ 925,825	\$ 658,500	\$ 313,594	\$ 717,133	\$ (311,173)	\$ 570,903	\$ 74,699							
<b>Rate of Return after 25% Subsidy Reduction</b>	<b>13.74%</b>	<b>12.68%</b>	<b>11.15%</b>	<b>11.25%</b>	<b>-6.89%</b>	<b>7.04%</b>	<b>5.01%</b>							
Subsidy after 25% Subsidy Reduction	791,326	517,283	207,688	482,231	(1,038,637)	36,934	(43,991)							
Change in Subsidy resulting from 25% Subsidy Reduction	-25.0%	-25.0%	-25.0%	-25.0%	-25.0%	-25.0%	-25.0%							
<b>Adjusted Revenue at Current Rates</b>														
Percentage Increase proposed by KU	8.45%	8.53%	8.52%	8.48%	23.21%	0.00%	19.31%							
Percentage Increase to achieve equalized Rates of Return	-16.02%	-12.51%	-8.14%	-9.13%	380.20%	7.38%	18.16%							
Percentage Increase to achieve 25% subsidy reduction	0.48%	1.29%	2.54%	2.64%	129.45%	8.31%	11.57%							

BIP Prod Trans Allocation  
 Corrected Demand Allocators  
 Removes ECR Rate Base  
 Present Revenues Reflect CSR Incr  
 Allocates CSR Credits on SCP

KENTUCKY UTILITIES  
 Cost of Service Study  
 Class Allocation

12 Months Ended  
 September 30, 2003

Description	Street Lighting	Decorative Street	Private Outdoor	Customer	Special
	St Lt	Lighting	Lighting	Outdoor/ Lighting	Contracts
	Dec St Lt	PO Lt	C.O.Lt		
<b>Cost of Service Summary – Pro-Forma</b>					
Total Pro-Forma Operating Revenue	\$ 5,421,077	\$ 807,012	\$ 6,328,527	\$ 898,820	\$ 14,115,482
Total Operating Expenses	\$ 5,595,768	\$ 685,056	\$ 4,880,284	\$ 722,198	\$ 11,794,204
Net Operating Income (Adjusted)	\$ (174,691)	\$ 121,956	\$ 1,448,234	\$ 176,622	\$ 2,321,278
Net Cost Rate Base	\$ 31,905,511	\$ 3,716,038	\$ 15,836,075	\$ 2,518,860	\$ 26,400,496
<b>Rate of Return</b>	<b>-0.55%</b>	<b>3.28%</b>	<b>9.15%</b>	<b>7.01%</b>	<b>8.79%</b>
Subsidy at Current Rates	(2,587,059)	(61,715)	1,300,372	116,380	2,011,128
<b>KU Proposed Increases</b>					
Proposed Base Rate Increase	512,748	76,631	517,636	72,319	676,728
Increase in Miscellaneous Charges	3	-	3	-	-
Decrease in Rents	(219)	(17)	(220)	(36)	-
Incremental Income Taxes	\$ (208,131)	\$ (31,112)	\$ (210,116)	\$ (29,353)	\$ (274,808)
Net Operating Income after Increase	\$ 129,710	\$ 167,459	\$ 1,755,537	\$ 219,552	\$ 2,723,198
<b>Rate of Return at KU Proposed Rates</b>	<b>0.41%</b>	<b>4.51%</b>	<b>11.09%</b>	<b>8.72%</b>	<b>10.31%</b>
Subsidy at KU Proposed Rates	(3,415,770)	(141,315)	1,152,074	82,784	1,578,032
Change in Subsidy resulting from KU Proposed Rates	32.0%	129.0%	-11.4%	-28.9%	-21.5%
Base Rate Increase Required for Equalized Rates of Return	3,928,518	217,946	(634,438)	(10,465)	(901,304)
Base Rate Increase Required for 25% Subsidy Reduction	1,988,224	171,660	340,841	76,820	607,042
Incremental Income Taxes	(807,298)	(69,702)	(138,322)	(31,181)	(246,510)
Net Operating Income after Increase	\$ 1,006,019	\$ 223,898	\$ 1,650,535	\$ 222,226	\$ 2,681,810
<b>Rate of Return after 25% Subsidy Reduction</b>	<b>3.15%</b>	<b>6.03%</b>	<b>10.42%</b>	<b>8.82%</b>	<b>10.15%</b>
Subsidy after 25% Subsidy Reduction	(1,940,294)	(46,286)	975,279	87,285	1,508,346
Change in Subsidy resulting from 25% Subsidy Reduction	-25.0%	-25.0%	-25.0%	-25.0%	-25.0%
<b>Adjusted Revenue at Current Rates</b>	5,402,425	807,559	6,293,269	893,164	14,551,478
Percentage Increase proposed by KU	9.49%	9.49%	8.23%	8.10%	4.65%
Percentage Increase to achieve equalized Rates of Return	72.72%	26.99%	-10.08%	-1.17%	-6.19%
Percentage Increase to achieve 25% subsidy reduction	36.80%	21.26%	5.42%	8.60%	4.17%

BIP Prod Trans Allocation  
 Corrected Demand Allocators  
 Removes ECR Rate Base  
 Present: Revenues Reflect CSR Incr  
 Allocates CSR Credits on SCP

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>LOUISVILLE GAS AND ELECTRIC COMPANY</b>	)	<b>2003-00433</b>
	)	
<b>AND</b>	)	
	)	
<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>KENTUCKY UTILITIES COMPANY</b>	)	<b>2003-00434</b>

**EXHIBIT (SJB-13)**

LOUISVILLE GAS AND ELECTRIC COMPANY  
Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Total System	Residential Rate R	Water Heating Rate WH	General Service Rate GS	Rate LC/LC-TOD	Rate LP/LP-TOD	Street Lighting Rate PSL	Street Lighting Rate SLE
<b>Cost of Service Summary – Pro-Forma</b>								
Total Pro-Forma Operating Revenue	\$ 709,631,942	\$ 269,278,378	\$ 952,526	\$ 96,312,757	\$ 163,343,827	\$ 128,897,802	\$ 5,453,014	\$ 189,714
Total Operating Expenses	\$ 641,996,290	\$ 257,792,040	\$ 1,325,576	\$ 81,866,738	\$ 141,786,579	\$ 115,774,394	\$ 4,801,103	\$ 187,590
Net Operating Income (Adjusted)	\$ 67,635,652	\$ 11,486,338	\$ (373,051)	\$ 16,424,019	\$ 21,563,248	\$ 13,123,408	\$ 651,910	\$ 2,124
Net Cost Rate Base	\$ 1,473,943,556	\$ 680,151,878	\$ 5,062,926	\$ 170,825,435	\$ 285,031,005	\$ 225,299,290	\$ 20,157,813	\$ 451,450
<b>Rate of Return</b>	<b>4.59%</b>	<b>1.69%</b>	<b>-7.37%</b>	<b>9.61%</b>	<b>7.57%</b>	<b>5.82%</b>	<b>3.23%</b>	<b>0.47%</b>
Subsidy at Current Rates	\$ 0	(33,300,831)	(1,021,989)	14,492,269	14,320,517	4,700,261	(461,109)	(31,389)
<b>LG&amp;E Proposed Increases</b>								
Proposed Base Rate Increase	64,260,364	26,277,410	156,774	8,974,815	13,708,637	10,638,506	586,307	17,030
Increase in Miscellaneous Charges	410,061	305,284	-	104,713	36	28	-	-
Incremental Income Taxes	(26,361,864)	(10,836,010)	(63,906)	(3,701,124)	(5,588,121)	(4,336,628)	(238,899)	(6,942)
Net Operating Income after increase	105,944,212	27,233,022	(280,183)	21,802,423	29,680,800	19,425,313	999,219	12,212
<b>Rate of Return at LG&amp;E Proposed Rates</b>	<b>7.19%</b>	<b>4.00%</b>	<b>-5.53%</b>	<b>12.76%</b>	<b>10.41%</b>	<b>8.82%</b>	<b>4.96%</b>	<b>2.70%</b>
Subsidy at LC&E Proposed Rates	(0)	(36,562,357)	(1,087,370)	16,076,190	15,522,384	5,452,942	(759,301)	(34,166)
Change in Subsidy resulting from LG&E Proposed Rates		9.8%	6.4%	10.9%	8.4%	16.0%	64.7%	8.9%
Base Rate Increase Required for Equalized Rates of Return	64,260,364	62,839,767	1,244,144	(7,101,375)	(1,813,747)	5,185,564	1,345,608	51,198
Base Rate Increase Required for 25% Subsidy Reduction	64,260,364	37,864,144	477,652	3,787,827	8,926,641	8,710,760	999,777	27,656
Incremental Income Taxes	(26,361,864)	(15,559,156)	(194,707)	(1,578,579)	(3,638,817)	(3,550,813)	(407,543)	(11,274)
Net Operating Income after increase	105,944,212	34,096,609	(80,106)	18,717,991	26,851,108	18,283,382	1,244,144	18,506
<b>Rate of Return after 25% Subsidy Reduction</b>	<b>7.19%</b>	<b>5.01%</b>	<b>-1.78%</b>	<b>10.95%</b>	<b>9.42%</b>	<b>8.12%</b>	<b>6.77%</b>	<b>4.10%</b>
Subsidy after 25% Subsidy Reduction	0	(24,975,623)	(766,492)	10,869,202	10,740,368	3,525,166	(345,831)	(23,542)
Change in Subsidy resulting from 25% Subsidy Reduction		-25.0%	-25.0%	-25.0%	-25.0%	-25.0%	-25.0%	-25.0%
<b>Adjusted Revenue at Current Rates</b>	561,367,938	213,814,897	722,586	81,284,688	128,727,508	98,118,565	4,777,509	138,741
Percentage Increase proposed by LG&E	11.45%	12.29%	21.70%	11.04%	10.65%	10.84%	12.27%	12.27%
Percentage Increase to achieve equalized Rates of Return	11.45%	29.39%	172.18%	-8.74%	-1.41%	5.28%	28.17%	36.90%
Percentage Increase to achieve 25% subsidy reduction	11.45%	17.71%	66.10%	4.64%	6.93%	8.88%	20.93%	19.93%

BIP Prod Trans Allocation  
Removes ECR Rate Base  
Present Revenues reflect CSR incr  
CSR Credits allocated on SCP

LOUISVILLE GAS AND ELECTRIC COMPANY

Cost of Service Study  
Class Allocation

12 Months Ended  
September 30, 2003

Description	Street Lighting Rate OL	Street Lighting Rate TLE	Special Contracts
<b>Cost of Service Summary – Pro-Forma</b>			
Total Pro-Forma Operating Revenue	\$ 6,617,260	\$ 677,761	\$ 35,908,904
Total Operating Expenses	\$ 5,693,263	\$ 566,398	\$ 32,186,608
Net Operating Income (Adjusted)	\$ 923,997	\$ 111,362	\$ 3,722,296
Net Cost Rate Base	\$ 25,495,128	\$ 1,001,089	\$ 60,367,542
<b>Rate of Return</b>	<b>3.62%</b>	<b>11.12%</b>	<b>6.17%</b>
Subsidy at Current Rates	(415,268)	110,441	1,607,097
<b>LG&amp;E Proposed Increases</b>			
Proposed Base Rate Increase	725,051	56,796	3,118,038
Increase in Miscellaneous Charges	-	-	-
Incremental Income Taxes	\$ (295,963)	\$ (23,152)	\$ (1,271,018)
Net Operating Income after Increase	\$ 1,354,085	\$ 145,006	\$ 5,569,315
<b>Rate of Return at LG&amp;E Proposed Rates</b>	<b>5.31%</b>	<b>14.48%</b>	<b>9.23%</b>
Subsidy at LC&E Proposed Rates	(607,912)	123,311	2,076,282
Change in Subsidy resulting from LC&E Proposed Rates	94.6%	11.7%	29.2%
Base Rate Increase Required for Equalized Rates of Return	1,533,963	(66,515)	1,041,756
Base Rate Increase Required for 25% Subsidy Reduction	1,222,512	16,316	2,247,079
Incremental Income Taxes	(498,337)	(6,651)	(915,986)
Net Operating Income after increase	\$ 1,648,172	\$ 121,028	\$ 5,053,389
<b>Rate of Return after 25% Subsidy Reduction</b>	<b>6.46%</b>	<b>12.09%</b>	<b>8.37%</b>
Subsidy after 25% Subsidy Reduction	(311,451)	82,631	1,205,322
Change in Subsidy resulting from 25% Subsidy Reduction	-25.0%	-25.0%	-25.0%
<b>Adjusted Revenue at Current Rates</b>	5,908,023	543,908	27,331,513
Percentage Increase proposed by LG&E	12.29%	10.44%	11.41%
Percentage Increase to achieve equalized Rates of Return	25.96%	-12.23%	3.81%
Percentage Increase to achieve 25% subsidy reduction	20.69%	3.00%	8.22%

BIP Prod Trans Allocation  
Removes ECR Rate Base  
Present Revenues reflect CSR Incr  
CSR Credits allocated on SCP

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>LOUISVILLE GAS AND ELECTRIC COMPANY</b>	)	<b>2003-00433</b>
	)	
<b>AND</b>	)	
	)	
<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>KENTUCKY UTILITIES COMPANY</b>	)	<b>2003-00434</b>

**EXHIBIT (SJB-14)**

KENTUCKY UTILITIES COMPANY  
 CALCULATION OF PROPOSED ELECTRIC RATE INCREASE  
 BASED ON SALES FOR THE 12 MONTHS ENDED SEPTEMBER 30, 2003

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
	Bills / KW	Total KWH	Present Rates	Calculated Revenue @ Present Rates (see Exhibit 9)	Proposed Rates	Calculated Revenue @ Proposed KU Rates	Proposed Rates	Calculated Revenue @ Proposed KIUC Rates
<b>LCIP - Rate Code 563</b>								
Number of Customers	315							
On-Peak Demand	4,068,204		\$ 4.14	\$ 16,842,364	\$ 120.00	\$ 37,800	\$ 120.00	\$ 37,800
Off-Peak Demand	3,969,563		\$ 0.73	\$ 2,897,781	\$ 5.52	22,456,486	\$ 4.79	19,476,875
CSR Credits	64,834		\$ (3.20)	\$ (207,469)	\$ 0.73	2,897,781	\$ 0.73	2,897,781
Penalties				21,553	\$ (4.19)	(271,655)	\$ (4.19)	(271,655)
Energy		2,080,874,735	\$ 0.02210	45,987,332	\$ 0.02200	45,779,244	\$ 0.02200	45,779,244
<b>Total Calculated at Base Rates</b>			\$	\$ 65,541,561	\$	\$ 70,921,209	\$	\$ 67,941,598
Correction Factor				0.999029		0.999029		0.999029
<b>Total After Application of Correction Factor</b>			\$	\$ 65,605,294	\$	\$ 70,990,174	\$	\$ 68,007,665
Fuel Clause Billings - proforma for rollin				1,698,726		1,698,726		1,698,726
Merger Surcredit				(1,573,353)		(1,573,353)		(1,573,353)
Value Delivery Surcredit				(192,241)		(192,241)		(192,241)
VDT Amortization & Surcredit Adjustment				8,140		8,140		8,140
Adjustment to Reflect Year-End Customers				-		-		-
<b>Total Rate LCI Primary</b>			\$	\$ 65,546,566	\$	\$ 70,931,445	\$	\$ 67,948,937
<b>Proposed Increase</b>				5,384,879		5,384,879		2,402,371
Percentage Increase				8.22%		8.22%		3.67%
<b>Total Rate LCI Primary (without Interruptible Credit)</b>			\$	\$ 71,203,101	\$	\$ 71,203,101	\$	\$ 68,220,592
<b>Proposed Increase (without Interruptible Credit)</b>				5,449,055		5,449,055		2,466,557
Percentage Increase				8.29%		8.29%		3.75%

KENTUCKY UTILITIES COMPANY  
 CALCULATION OF PROPOSED ELECTRIC RATE INCREASE  
 BASED ON SALES FOR THE 12 MONTHS ENDED SEPTEMBER 30, 2003

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(6)	(7)
	Bills / KW	Total KWH	Present Rates	Calculated Revenue @ Present Rates (see Exhibit 9)	Proposed Rates	Calculated Revenue @ Proposed Rates	Proposed Rates	Calculated Revenue @ Proposed Rates
<b>LCIT - Rate Code 564</b>								
Number of Customers	48							
On-Peak Demand	1,099,952		\$ 3.95	\$ 4,344,810	\$ 120.00	\$ 5,760	\$ 120.00	\$ 5,760
Off-Peak Demand	1,092,494		\$ 0.73	797,521	\$ 5.33	5,862,744	\$ 4.60	5,057,123
CSR Credits	122,014		\$ (3.10)	(378,243)	\$ 0.73	797,521	\$ 0.73	797,521
Penalties				76,807	\$ (4.09)	(499,036)	\$ (4.09)	(499,036)
Energy		621,047,926	\$ 0.02210	13,725,159	\$ 0.02200	13,663,054	\$ 0.02200	13,663,054
<b>Total Calculated at Base Rates</b>			\$	18,566,054	\$	19,906,850	\$	19,101,229
Correction Factor				0.999990		0.999990		0.999990
<b>Total After Application of Correction Factor</b>			\$	18,566,238	\$	19,907,046	\$	19,101,418
Fuel Clause Billings - proforma for rollin				526,690		526,690		526,690
Merger Surcredit				(450,942)		(450,942)		(450,942)
Value Delivery Surcredit				(55,117)		(55,117)		(55,117)
VDT Amortization & Surcredit Adjustment				2,334		2,334		2,334
Adjustment to Reflect Year-End Customers				-		-		-
<b>Total Rate LCI Transmission</b>			\$	18,589,204	\$	19,930,012	\$	19,124,383
<b>Proposed Increase</b>				1,340,808		1,340,808		535,180
Percentage Increase				7.21%		7.21%		2.69%
<b>Total Rate LCI Primary (without Interruptible Credit)</b>			\$	18,967,446	\$	20,429,048	\$	19,623,420
<b>Proposed Increase (without Interruptible Credit)</b>				1,461,602		1,461,602		655,974
Percentage Increase				7.71%		7.71%		3.46%
<b>Total Rate LCI (without Interruptible Credit)</b>			\$	84,721,482	\$	91,632,149	\$	87,844,012
<b>Proposed Increase (without Interruptible Credit)</b>				6,910,667		6,910,667		3,122,530
Percentage Increase				8.16%		8.16%		3.69%

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>LOUISVILLE GAS AND ELECTRIC COMPANY</b>	)	<b>2003-00433</b>
	)	
<b>AND</b>	)	
	)	
<b>AN ADJUSTMENT OF THE GAS AND ELECTRIC</b>	)	
<b>RATES, TERMS, AND CONDITIONS OF</b>	)	<b>CASE NO.</b>
<b>KENTUCKY UTILITIES COMPANY</b>	)	<b>2003-00434</b>

**EXHIBIT (SJB-15)**

LOUISVILLE GAS AND ELECTRIC COMPANY  
 CALCULATION OF PROPOSED ELECTRIC RATE INCREASE  
 BASED ON SALES FOR THE 12 MONTHS ENDED SEPTEMBER 30, 2003

Billing Determinants	Present Rates	Calculated Revenue at Present Rates	Proposed Rates	Calculated Revenue at Proposed Rates	Proposed Rates	Calculated Revenue at Proposed Rates
<b>INDUSTRIAL POWER RATE LP - TRANSMISSION VOLTAGE</b>						
Customer Charges	\$ -	-	\$ 90.00	\$ -	\$ 90.00	\$ -
Demand Charges						
<i>kWh-Months</i>						
Summer Season	\$ 7.39	-	\$ 12.01	-	\$ 11.65	-
Winter Season	\$ 4.87	-	\$ 9.49	-	\$ 9.13	-
Energy Charges						
<i>kWh's</i>						
Power Factor Provision	\$ 0.02480	-	\$ 0.02000	-	\$ 0.02000	-
Summer Season	\$ 7.39	-	\$ 12.01	-	\$ 11.65	-
Winter Season	\$ 4.87	-	\$ 9.49	-	\$ 9.13	-
Subtotal @ base rates before application of correction factor	\$ -	-	\$ -	-	\$ -	-
Correction Factor -						
Subtotal @ base rates after application of correction factor	\$ -	-	\$ -	-	\$ -	-
Fuel Adjustment Clause - proforma for rollin						
Merger Surcredit						
Value Delivery Surcredit						
VDI Amortization & Surcredit Adjustment						
Adjustment to Reflect Year-End Customers						
<b>TOTAL INDUSTRIAL POWER RATE LP PRIMARY</b>	\$ -	-	\$ -	-	\$ -	-
<b>PROPOSED INCREASE</b>						
Percentage Increase						

Note: Currently no customers are served under this rate

LOUISVILLE GAS AND ELECTRIC COMPANY  
 CALCULATION OF PROPOSED ELECTRIC RATE INCREASE  
 BASED ON SALES FOR THE 12 MONTHS ENDED SEPTEMBER 30, 2003

	Billing Determinants		Present Rates	Calculated Revenue at Present Rates	Proposed Rates	Calculated Revenue at Proposed Rates	Proposed Rates	Calculated Revenue at Proposed KIUC Rates
<b>INDUSTRIAL POWER RATE LP - PRIMARY VOLTAGE</b>								
Customer Charges	494		\$ 42.64	\$ 21,064	\$ 90.00	\$ 44,460	\$ 90.00	\$ 44,460
Demand Charges		<i>kWh-Months</i>						
Summer Season		95,177	\$ 8.55	813,763	\$ 13.17	1,253,481	\$ 12.81	1,218,979
Winter Season		181,277	\$ 6.01	1,089,475	\$ 10.63	1,926,975	\$ 10.27	1,861,261
		276,454						
Energy Charges		<i>kWh's</i>						
		111,622,714	\$ 0.02480	2,768,243	\$ 0.02000	2,232,454	\$ 0.02000	2,232,454
Power Factor Provision		<i>kWh-Months</i>						
Summer Season		(806)	\$ 8.55	(6,891)	\$ 13.17	(10,615)	\$ 12.81	(10,323)
Winter Season		(3,501)	\$ 6.01	(21,041)	\$ 10.63	(37,216)	\$ 10.27	(35,947)
		(4,307)						
<b>Subtotal @ base rates before application of correction factor</b>			\$	4,664,613	\$	5,409,539	\$	5,310,885
Correction Factor -			0.999681		0.999681		0.999681	
<b>Subtotal @ base rates after application of correction factor</b>			\$	4,666,103	\$	5,411,266	\$	5,312,591
Fuel Adjustment Clause - proforma for rollin				(58,665)		(58,665)		(58,665)
Merger Surcredit				(130,757)		(130,757)		(130,757)
Value Delivery Surcredit				(29,824)		(29,824)		(29,824)
VDT Amortization & Surcredit Adjustment				349		349		349
Adjustment to Reflect Year-End Customers				-		-		-
<b>TOTAL INDUSTRIAL POWER RATE LP PRIMARY</b>			\$	4,447,206	\$	5,192,370	\$	5,093,684
<b>PROPOSED INCREASE</b>								
Percentage Increase						745,164		646,478
						15.76%		14.54%

LOUISVILLE GAS AND ELECTRIC COMPANY  
 CALCULATION OF PROPOSED ELECTRIC RATE INCREASE  
 BASED ON SALES FOR THE 12 MONTHS ENDED SEPTEMBER 30, 2003

	Billing Determinants	Present Rates	Calculated Revenue at Present Rates	Proposed Rates	Calculated Revenue at Proposed Rates	Proposed Rates	Calculated Revenue at Proposed KIUC Rates
<b>INDUSTRIAL POWER RATE LP - SECONDARY VOLTAGE</b>							
Customer Charges	4,225	\$ 42.64	\$ 180,154	\$ 90.00	\$ 380,250	\$ 90.00	\$ 380,250
Demand Charges							
Summer Season	<i>kWh-Months</i> 495,852	\$ 10.41	\$ 5,161,819	\$ 14.27	\$ 7,075,808	\$ 13.91	\$ 6,896,060
Winter Season	927,407	\$ 7.90	\$ 7,326,515	\$ 11.73	\$ 10,878,484	\$ 11.37	\$ 10,542,296
	1,423,259						
Energy Charges	<i>kWh's</i> 553,836,275	\$ 0.02480	\$ 13,735,140	\$ 0.02000	\$ 11,076,726	\$ 0.02000	\$ 11,076,726
Power Factor Provision							
Summer Season	<i>kWh-Months</i> (4,581)	\$ 10.41	\$ (47,688)	\$ 14.27	\$ (65,371)	\$ 13.91	\$ (63,710)
Winter Season	(10,121)	\$ 7.90	\$ (79,956)	\$ 11.73	\$ (118,719)	\$ 11.37	\$ (115,050)
	(14,702)						
<b>Subtotal @ base rates before application of correction factor</b>		\$ 0.999681	\$ 26,275,984	0.999681	\$ 29,227,177	0.999681	\$ 28,716,571
<b>Subtotal @ base rates after application of correction factor</b>		\$	\$ 26,284,374	\$	\$ 29,236,509	\$	\$ 28,725,740
Fuel Adjustment Clause - proforma for rollin			(277,626)		(277,626)		(277,626)
Merger Surcredit			(738,856)		(738,856)		(738,856)
Value Delivery Surcredit			(167,175)		(167,175)		(167,175)
VDI Amortization & Surcredit Adjustment			1,955		1,955		1,955
Adjustment to Reflect Year-End Customers	3,146,798		147,900		165,294		162,285
<b>TOTAL INDUSTRIAL POWER RATE LP SECONDARY</b>		\$	\$ 25,250,571	\$	\$ 28,220,101	\$	\$ 27,706,322
<b>PROPOSED INCREASE</b>			\$	\$	\$ 2,969,530	\$	\$ 2,455,752
Percentage Increase					11.76%		9.73%

LOUISVILLE GAS AND ELECTRIC COMPANY  
 CALCULATION OF PROPOSED ELECTRIC RATE INCREASE  
 BASED ON SALES FOR THE 12 MONTHS ENDED SEPTEMBER 30, 2003

Billing Determinants		Present Rates	Calculated Revenue at Present Rates	Proposed Rates	Calculated Revenue at Proposed Rates	Proposed Rates	Calculated Revenue at Proposed KIUC Rates
INDUSTRIAL POWER RATE LPTOD - TRANSMISSION VOLTAGE							
Customer Charges	73	\$ 44.62	\$ 3,257	\$ 120.00	\$ 8,760	\$ 120.00	\$ 8,760
Basic Demand Charges	<i>kW-Months</i> 696,788	\$ 2.05	1,428,415	\$ 2.33	1,623,516	\$ 2.23	1,556,006
Peak Demand Charges	<i>kW-Months</i>						
Summer Peak	234,813	\$ 5.36	1,258,598	\$ 9.65	2,265,945	\$ 9.38	2,203,576
Winter Peak	454,878	\$ 2.84	1,291,854	\$ 7.11	3,234,183	\$ 6.84	3,113,360
	689,691						
Energy Charges	<i>kWh's</i> 376,359,726	\$ 0.02480	9,333,721	\$ 0.02000	7,527,195	\$ 0.02000	7,527,195
Power Factor Provision	<i>kW-Months</i>						
Basic Demand	(25,159)	\$ 2.05	(51,576)	\$ 2.33	(58,620)	\$ 2.23	(56,183)
Summer Peak	(7,762)	\$ 5.36	(41,604)	\$ 9.65	(74,903)	\$ 9.38	(72,842)
Winter Peak	(17,215)	\$ 2.84	(48,891)	\$ 7.11	(122,399)	\$ 6.84	(117,826)
Interruptible Service Rider	<i>kW-Months</i> 411,322	\$ (3.30)	(1,357,363)	\$ (3.98)	(1,637,062)	\$ (3.98)	(1,637,062)
<b>Subtotal @ base rates before application of correction factor</b>		\$	11,816,412	\$	12,766,615	\$	12,524,984
Correction Factor -		1.000343		1.000343		1.000343	
<b>Subtotal @ base rates after application of correction factor</b>		\$	11,812,356	\$	12,762,233	\$	12,520,685
Fuel Adjustment Clause - proforma for rollin			(213,291)		(213,291)		(213,291)
Merger Surcredit			(328,889)		(328,889)		(328,889)
Value Delivery Surcredit			(74,173)		(74,173)		(74,173)
VDT Amortization & Surcredit Adjustment			867		867		867
Adjustment to Reflect Year-End Customers			-		-		-
<b>TOTAL INDUSTRIAL POWER RATE LPTOD TRANSMISSION</b>		\$	11,196,870	\$	12,146,747	\$	11,905,199
<b>PROPOSED INCREASE</b>							
Percentage Increase					949,877		708,329
					8.48%		6.33%
<b>TOTAL INDUSTRIAL POWER RATE LPTOD TRANSMISSION (without Interruptible Credit)</b>		\$	12,554,232	\$	13,783,808	\$	13,542,260
<b>PROPOSED INCREASE (without Interruptible Credit)</b>							
Percentage Increase					1,229,576		988,028
					9.79%		7.87%

LOUISVILLE GAS AND ELECTRIC COMPANY  
 CALCULATION OF PROPOSED ELECTRIC RATE INCREASE  
 BASED ON SALES FOR THE 12 MONTHS ENDED SEPTEMBER 30, 2003

	Billing Determinants		Present Rates	Calculated Revenue at Present Rates	Proposed Rates	Calculated Revenue at Proposed Rates	Proposed Rates	Calculated Revenue at Proposed Rates
	540	Customer Charges						
<b>INDUSTRIAL POWER RATE LPTOD - PRIMARY VOLTAGE</b>								
Customer Charges			\$ 44.62	\$ 24,095	\$ 120.00	\$ 64,800	\$ 120.00	\$ 64,800
Basic Demand Charges	<i>kW-Months</i>		\$ 3.20	9,483,405	\$ 3.52	10,431,745	\$ 3.42	10,144,612
Peak Demand Charges	<i>kW-Months</i>							
Summer Peak	996,472		\$ 5.36	5,341,090	\$ 9.65	9,615,955	\$ 9.38	9,351,277
Winter Peak	1,952,825		\$ 2.84	5,546,023	\$ 7.11	13,884,586	\$ 6.84	13,365,885
	2,949,297							
Energy Charges	<i>kWh's</i>		\$ 0.02480	39,614,547	\$ 0.02000	31,947,215	\$ 0.02000	31,947,215
Power Factor Provision								
Basic Demand	<i>kW-Months</i>		\$ 3.20	(332,489)	\$ 3.52	(365,737)	\$ 3.42	(355,671)
Summer Peak	(103,903)		\$ 5.36	(221,623)	\$ 9.65	(399,004)	\$ 9.38	(386,022)
Winter Peak	(41,348)		\$ 2.84	(165,376)	\$ 7.11	(414,023)	\$ 6.84	(398,556)
	(58,231)							
Interruptible Service Rider	<i>kW-Months</i>		\$ (3.30)	(1,138,160)	\$ (4.05)	(1,396,833)	\$ (4.05)	(1,396,833)
	344,897							
Subtotal @ base rates before application of correction factor			\$	58,151,511	\$	63,369,703	\$	62,334,709
Correction Factor -			1.000342		1.000342		1.000342	
Subtotal @ base rates after application of correction factor			\$	58,131,626	\$	63,347,034	\$	62,313,393
Fuel Adjustment Clause - proforma for roll in				(864,770)		(864,770)		(864,770)
Merger Surcredit				(1,626,347)		(1,626,347)		(1,626,347)
Value Delivery Surcredit				(366,371)		(366,371)		(366,371)
VDI Amortization & Surcredit Adjustment				4,284		4,284		4,284
Adjustment to Reflect Year-End Customers				-		-		-
<b>TOTAL INDUSTRIAL POWER RATE LPTOD PRIMARY</b>			\$	55,278,422	\$	60,493,830	\$	59,460,189
<b>PROPOSED INCREASE</b>				\$	\$	5,215,408	\$	4,181,767
Percentage Increase						9.43%		7.56%
<b>TOTAL INDUSTRIAL POWER RATE LPTOD PRIMARY (without Interruptible Credit)</b>			\$	56,416,582	\$	61,890,663	\$	60,857,022
<b>PROPOSED INCREASE (without Interruptible Credit)</b>				\$	\$	5,474,081	\$	4,440,440
Percentage Increase						9.70%		7.87%

LOUISVILLE GAS AND ELECTRIC COMPANY  
 CALCULATION OF PROPOSED ELECTRIC RATE INCREASE  
 BASED ON SALES FOR THE 12 MONTHS ENDED SEPTEMBER 30, 2003

Billing Determinants		Present Rates	Calculated Revenue at Present Rates	Proposed Rates	Calculated Revenue at Proposed Rates	Proposed Rates	Calculated Revenue at Proposed KIUC Rates
151	Customer Charges	\$ 44.62	\$ 6,738	\$ 120.00	\$ 18,120	\$ 120.00	\$ 18,120
	Basic Demand Charges	\$ 5.11	\$ 587,476	\$ 4.62	\$ 531,143	\$ 4.52	\$ 520,004
	Peak Demand Charges						
	Summer Peak	\$ 5.36	\$ 170,057	\$ 9.65	\$ 306,166	\$ 9.38	\$ 297,738
	Winter Peak	\$ 2.84	\$ 227,393	\$ 7.11	\$ 569,283	\$ 6.84	\$ 548,016
	Energy Charges	\$ 0.02480	\$ 1,061,711	\$ 0.02000	\$ 856,218	\$ 0.02000	\$ 856,218
	Power Factor Provision						
	Basic Demand	\$ 5.11	\$ (9,970)	\$ 4.62	\$ (9,014)	\$ 4.52	\$ (8,825)
	Summer Peak	\$ 5.36	\$ (2,657)	\$ 9.65	\$ (5,143)	\$ 9.38	\$ (5,002)
	Winter Peak	\$ 2.84	\$ (3,987)	\$ 7.11	\$ (9,982)	\$ 6.84	\$ (9,610)
	Subtotal @ base rates before application of correction factor	\$ 1.000343	\$ 2,036,561	\$ 1.000343	\$ 2,256,791	\$ 1.000343	\$ 2,216,661
	Correction Factor -						
	Subtotal @ base rates after application of correction factor	\$ 1.000343	\$ 2,035,862	\$ 1.000343	\$ 2,256,016	\$ 1.000343	\$ 2,215,900
	Fuel Adjustment Clause - proforma for rollin		\$ (21,506)		\$ (21,506)		\$ (21,506)
	Merger Surcredit		\$ (56,520)		\$ (56,520)		\$ (56,520)
	Value Delivery Surcredit		\$ (12,486)		\$ (12,486)		\$ (12,486)
	VDI Amortization & Surcredit Adjustment		\$ 146		\$ 146		\$ 146
	Adjustment to Reflect Year-End Customers		\$ -		\$ -		\$ -
	TOTAL INDUSTRIAL POWER RATE LPTOD SECONDARY	\$ 1.945496	\$ 1,945,496	\$ 2.125534	\$ 2,165,650	\$ 2.125534	\$ 2,125,534
	PROPOSED INCREASE		\$ 220,155		\$ 180,039		\$ 180,039
	Percentage Increase		11.32%		9.25%		9.25%
	TOTAL INDUSTRIAL POWER RATE LESS INTERRUPTIBLE CREDIT	\$ 100,614,087	\$ 111,252,592	\$ 109,324,823	\$ 109,324,823	\$ 8,710,736	\$ 109,324,823
	PROPOSED INCREASE		\$ 10,638,505		\$ 8,710,736		\$ 8,710,736
	Percentage Increase		10.57%		8.66%		8.66%

**EXHIBIT (SJB-16)**

**ANALYSIS OF LGE/IKU EXPECTED HOURLY OPERATION OF COMBUSTION TURBINES**  
 (Test year ending September 30, 2003 and Calendar year 2004)

Unit	Mw	Test Year Hours	2004 Hours	Average Hours <sup>1</sup>	Mw <sup>2</sup>	Mw Wtd Hrs <sup>3</sup>	Heat Rate	Mw Wtd HR <sup>2</sup>
Cane Run 11	14	3	0	1.5	0	0		
Brown 5	117	76	70	73	117	6.44	12,185	451
Brown 6	154	171	370	270.5	154	31.39	10,532	1,902
Brown 7	154	221	306	263.5	154	30.58	10,544	1,855
Brown 8	106	108	45	76.5	106	6.11	12,033	423
Brown 9	106	67	40	53.5	106	4.27	11,994	295
Brown 10	106	83	43	63	106	5.03	11,920	345
Brown 11	106	36	36	36	106	2.88	11,875	196
Heafing	36	0	0	0	0	0.00		
Paddys Run 11	12	0	0	0	0	0.00		
Paddys Run 12	23	0	0	0	0	0.00		
Paddys Run 13	158	293	87	190	158	22.62	9,919	1,291
Trimble County 5	160	375	207	291	160	35.09	10,624	2,144
Trimble County 6	160	310	178	244	160	29.42	10,645	1,802
Trimble County 7	155		148	148	0	0.00		
Trimble County 8	155		104	104	0	0.00		
Trimble County 9	155		0	0	0	0.00		
Trimble County 10	155		0	0	0	0.00		
Waterside 7	11	0	0	0	0	0.00		
Waterside 8	11	0	0	0	0	0.00		
Zorn 1	14	4	0	2	0	0.00		
<b>Weighted Average</b>	<b>2068</b>	<b>1747</b>	<b>1634</b>	<b>1817</b>	<b>1327</b>	<b>174</b>		<b>10,704</b>

<sup>1</sup> If unit was not shown as available in test year, average is set at 2004 hours.

<sup>2</sup> Weighted by "Mw weighted hours" for non-zero capacity factor units in both test year and 2004.

<sup>3</sup> Weighted average hours of operation for non-zero capacity factor units in both test year and 2004.

<sup>4</sup> Mw for units with non-zero capacity factors in both test year and 2004.

**EXHIBIT (SJB-17)**

**Kentucky Utilities Company**

**ELECTRIC RIDER**

**CSR  
Curtable Service Rider  
(KIUC REVISED)**

**APPLICABLE**

In all territory served.

**AVAILABILITY OF SERVICE**

This rider shall be made available to any customer served under the applicable power schedules who contracts for not less than 1,000 kilowatts of their total requirements to be subject to curtailment upon notification by the Company.

**CONTRACT OPTION**

Customer may, at Customer's option, contract with Company to curtail service upon notification by the Company. Requests for curtailment shall not exceed ~~one hundred seventy-five (175)~~ hours per year nor shall any single request for curtailment be for less than thirty (30) minutes or for more than fourteen (14) hours per calendar day, with unlimited requests for curtailment per calendar day within these parameters. Company may request or cancel a curtailment at any time during an hour, but shall give no less than ~~one hour~~ notice when either requesting or canceling a curtailment.

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Compliance with a request for curtailment shall be measured in one of the following two ways:

- a) The customer shall contract for a given amount of firm demand, and the curtailment load shall be the Customer's monthly billing demand in excess of the firm contract. During a request for curtailment, the customer shall reduce its demand to the firm demand designated in the contract. The difference in the maximum demand in the billing month and the maximum demand in any requested curtailment period, but not less than the contracted firm demand, in the billing period shall be the curtable demand on which the monthly credit is based. The demand in excess of the firm load during each requested curtailment in the billing period shall be the measure of non-compliance.
- b) The customer shall contract for a given amount of curtable load by which the customer shall agree to reduce its demand from the monthly maximum demand. During a request for curtailment, the Customer shall reduce its demand to a level equal to the maximum monthly demand less the curtable load designated in the contract. The difference in the maximum demand in the billing month and the maximum demand in any requested curtailment period, but not more than the contracted curtable load, in the billing period shall be the curtable demand on which the monthly credit is based. The difference in contracted curtable load and the actual curtailed load during each requested curtailment in the billing period shall be the measure of non-compliance.
- c) In those months in which the Company does not request load curtailment, the customer will receive a credit based on either the difference in the monthly billing demand and the contracted firm demand, a) above, or the contracted curtable demand, b) above.

**RATE**

Customer will receive a credit against the applicable power schedule for curtailable kW, as determined in the preceding paragraph, times the applicable credit. Customers will be charged for the portion of each requested curtailment not met at the applicable charge.

	<u>Primary</u>	<u>Transmission</u>
Demand Credit of:	\$ 4.19 per KW	\$ 4.09 per KW
Non-Compliance Charge of	\$16.00 per KW	\$16.00 per KW

For each kWh of actual interrupted energy, customer will receive an additional credit equal to the avoided energy cost of the Company's average combustion turbine capacity less the applicable energy charge paid by the customer under customer's applicable firm tariff. The average cost of combustion turbine capacity will be determined by multiplying the monthly average cost of natural gas per mmbtu used to supply its combustion turbine capacity times a heat rate of 10,704 btu's per kWh. Actual interrupted energy shall be determined by accumulating the kW of interrupted demand over the interruption period during any month.

Failure of Customer to curtail when requested to do so may result in termination of service under this rider.

**BUY-THROUGH OPTION**

Upon notification of a request for interruption, customer will be offered the option of purchasing energy at the Company's avoided cost, based on prevailing market conditions, in lieu of being interrupted. The Company shall provide customer with the cost, in dollars per mWh, associated with such buy-through energy, based on the Company's best estimate at the time. In addition, the Company shall be permitted to charge customer a transaction fee of one-half (0.5) mill per kWh to cover the costs of obtaining the buy-through energy. This buy-through provision shall only apply in the event of a Company request for an economic interruption. It shall not be applicable in the event of a request to interrupt for reliability reasons, as determined by the Company's system operators.

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**TERM OF CONTRACT**

The minimum original contract period shall be one year and thereafter until terminated by giving at least 6 months previous written notice, but Company may require that contract be executed for a longer initial term when deemed necessary by the size of the load or other conditions.

**TERMS AND CONDITIONS**

Except as specified above, all other provisions of the power rate to which this schedule is a rider shall apply

**EXHIBIT (SJB-18)**

**Louisville Gas and Electric Company**

**ELECTRIC RIDER**

**CSR  
Curtable Service Rider  
(KIUC REVISED)**

**APPLICABLE**

In all territory served.

**AVAILABILITY OF SERVICE**

This rider shall be made available to any customer served under the applicable power schedules who contracts for not less than 1,000 kilowatts of their total requirements to be subject to curtailment upon notification by the Company.

**CONTRACT OPTION**

Customer may, at Customer's option, contract with Company to curtail service upon notification by the Company. Requests for curtailment shall not exceed ~~one hundred seventy-five (175)~~ hours per year nor shall any single request for curtailment be for less than thirty (30) minutes or for more than fourteen (14) hours per calendar day, with unlimited requests for curtailment per calendar day within these parameters. Company may request or cancel a curtailment at any time during an hour, but shall give no less than ~~one hour~~ notice when either requesting or canceling a curtailment.

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Compliance with a request for curtailment shall be measured in one of the following two ways:

- a) The customer shall contract for a given amount of firm demand, and the curtailment load shall be the Customer's monthly billing demand in excess of the firm contract. During a request for curtailment, the customer shall reduce its demand to the firm demand designated in the contract. The difference in the maximum demand in the billing month and the maximum demand in any requested curtailment period, but not less than the contracted firm demand, in the billing period shall be the curtable demand on which the monthly credit is based. The demand in excess of the firm load during each requested curtailment in the billing period shall be the measure of non-compliance.
- b) The customer shall contract for a given amount of curtable load by which the customer shall agree to reduce its demand from the monthly maximum demand. During a request for curtailment, the Customer shall reduce its demand to a level equal to the maximum monthly demand less the curtable load designated in the contract. The difference in the maximum demand in the billing month and the maximum demand in any requested curtailment period, but not more than the contracted curtable load, in the billing period shall be the curtable demand on which the monthly credit is based. The difference in contracted curtable load and the actual curtailed load during each requested curtailment in the billing period shall be the measure of non-compliance.
- c) In those months in which the Company does not request load curtailment, the customer will receive a credit based on either the difference in the monthly billing demand and the contracted firm demand, a) above, or the contracted curtable demand, b) above.

**RATE**

Customer will receive a credit against the applicable power schedule for curtailable kW, as determined in the preceding paragraph, times the applicable credit. Customers will be charged for the portion of each requested curtailment not met at the applicable charge.

	<u>Primary</u>	<u>Transmission</u>
Demand Credit of:	\$ 4.05 per KW	\$ 3.98 per KW
Non-Compliance Charge of	\$16.00 per KW	\$16.00 per KW

For each kWh of actual interrupted energy, customer will receive an additional credit equal to the avoided energy cost of the Company's average combustion turbine capacity less the applicable energy charge paid by the customer under customer's applicable firm tariff. The average cost of combustion turbine capacity will be determined by multiplying the monthly average cost of natural gas per mmbtu used to supply its combustion turbine capacity times a heat rate of 10,704 btu's per kWh. Actual interrupted energy shall be determined by accumulating the kW of interrupted demand over the interruption period during any month.

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**TERMS AND CONDITIONS**

Except as specified above, all other provisions of the power rate to which this schedule is a rider shall apply